

March 4, 2009

MEMORANDUM

TO: Linda M. Cruciani, Deputy General Counsel for Operations

FROM: Ronald C. Sims, Designate for Deputy Secretary  
U.S. Department of Housing and Urban Development

*RCS*  
*3-4-09*

SUBJECT: Ethics Agreement

The purpose of this memorandum 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 Deputy Secretary of the United States Department of Housing and Urban Development.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, 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 any minor children 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 position as King County Executive and will have a "covered relationship" for a period of one year under 5 C.F.R. § 2635.502 with King County. You have advised me that my participation in particular matters involving specific parties in which King County is a party or represents a party will be authorized pursuant to 5 C.F.R. § 2635.502(d). This authorization will not extend to any particular matter involving specific parties in which I previously participated in my position as County Executive. This authorization also will not extend to any litigation before a court in which King County is a party or represents a party.

Upon confirmation, I will resign from my positions as Board Member of the Puget Sound Clean Air Agency, as Board Member of the Committee to End Homelessness, as Board Member of the Puget Sound Health Alliance, as Board Member of Bastyr University, as Board Member of the National Committee for Quality Assurance, as Board Member of Reconnecting America Center for Transit-Oriented Development, as Board Member of Transportation for America, as Advisory Board Member of the Brookings Institution, as Board Member of the Paul Robeson Scholar Athlete Award, as Board Member of Exloco, as Board Member of the Center for Clean Air Policy, and as Board Member of ICLEI – Local Governments for Sustainability. 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 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).

My spouse is a consultant for the Asian Pacific American Labor Alliance. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my spouse's compensation with the Asian Pacific American Labor Alliance. I also will not participate personally and substantially in any particular matter involving specific parties in which the Asian Pacific Labor Alliance is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).