Jolene A. Lauria
Designated Agency Ethics Official
Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

Dear Ms. Lauria,

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 United States Attorney for the Western District of Arkansas. 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 determining whether I have an actual or potential conflict of interest during my appointment, I will consult with the Executive Office for United States Attorneys (EOUSA), General Counsel's Office, and will follow the procedures outlined in the United States Attorneys' Procedures, (USAP) 3-2.170.001, et seq. 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), or obligations of the United States.

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 – CONFLICTS OF INTEREST REVIEW AND COUNSELING

I have been advised that the duties of the position of United States Attorney may involve particular confidential matters identified by the United States Attorney's Office (USAO) that may affect my financial interests. EOUSA has determined that it is not necessary at this time for me to divest my financial interests because my recusal from particular matters in which these interests pose a conflict of interest will not substantially limit my ability to perform the essential duties of the position of United States Attorney. Immediately upon confirmation, EOUSA will prepare recusals for all particular matters in which I will not be granted a waiver or will not qualify for a regulatory exemption.

I have been informed that the USAO has conducted a conflict review and has found no additional conflicts of interest. Should additional conflicts arise, I will seek the necessary waiver(s) or implement the necessary recusal(s) immediately upon my confirmation. An appropriate screening mechanism will be identified and immediately upon my appointment, all necessary USAO personnel will be advised in writing of all matters in which I may not participate. The notification will specifically list the matters and identify the Acting United States Attorney for those matters.

SECTION 3 – 21st JUDICIAL DISTRICT PROSECUTING ATTORNEY'S OFFICE

I currently serve as the Prosecuting Attorney for the 21st Judicial District Prosecuting Attorney's Office. Upon confirmation, I will resign from my position with 21st Judicial District Prosecuting Attorney's Office. For a period of one year after my resignation, I will have a "covered relationship" under 5 C.F.R. § 2635.502 with the 21st Judicial District Prosecuting Attorney's Office. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization to participate in particular matters involving specific parties in which the 21st Judicial District Prosecuting Attorney's Office is a party or represents a party. Until such an authorization is granted, I will recuse pursuant to the impartiality regulation at 5 C.F.R. § 2635.502 for a period of one year after my resignation. However, during my appointment to the position of United States Attorney, I will not participate personally and substantially in any particular matter involving specific parties in which I previously participated as the Prosecuting Attorney for the 21st Judicial District Prosecuting Attorney's Office.

SECTION 4 – SOUTHEASTERN CONFERENCE AND SUN BELT CONFERENCE

Upon confirmation, I will cease providing services to Southeastern Conference and Sun Belt Conference as an independent contractor. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after I cease providing services, I also will not participate personally and substantially in any particular matter involving specific parties in which I know Southeastern Conference or Sun Belt Conference is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 5 – SPOUSE EMPLOYMENT

My spouse is employed by Dawson Education Cooperative, in a position for which my spouse receives a fixed annual salary. Dawson Education Cooperative has a contract with the Van Buren School District for which my spouse provides services. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for as long as my spouse continues to work for Dawson Education Cooperative, I will not participate personally and substantially in any particular matter involving specific parties in which I know Dawson Education Cooperative or any client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

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,

Kevin Holmes
November 13, 2025