

JUN - 2 2014

MEMORANDUM

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

FROM: Julián Castro, Designate for Secretary
U.S. Department of Housing and Urban Development

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 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 Mayor of the City of San Antonio. For a period of one year after my resignation, I will have a "covered relationship" under 5 C.F.R. § 2635.502 with the City of San Antonio. You have advised me that my participation in particular matters involving specific parties in which San Antonio 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 Mayor. This authorization also will not extend to any litigation before a court in which San Antonio is a party or represents a party.

I am the sole proprietor of a law firm, which did business as the Law Offices of Julián Castro. This firm has been dormant since 2012. I will dissolve the firm within 90 days of my confirmation. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the Law Offices of Julián Castro.

Upon confirmation, I will resign from my positions as Member of the Board of Directors of Lyndon B. Johnson Foundation; Chairman of the Board of Directors of SA2020; and Co-chair of the Mayors for Freedom to Marry. I have already resigned from my position as Trustee of the Texas Biomedical Research Institute. 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). I will also resign from my position as honorary chair of Toward Tomorrow PAC.

Before learning of my consideration for a possible nomination to the position of Secretary, I entered into an agreement with Little Brown and Company to receive an advance paid in two installments for a book I am writing. I have received the first of the two installments. I understand that

if my nomination is confirmed by the Senate, I may not work on this book during my appointment to the position of Secretary. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of Little Brown and Company to honor its contractual obligations regarding any advances or royalties, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I also will not participate personally and substantially in any particular matter involving specific parties in which Little Brown and Company is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I currently am associated with the Julián Castro for Mayor Campaign, which was formed to support my campaign for election to be Mayor of San Antonio, Texas. If confirmed for the position of Secretary of the Department of Housing and Urban Development, the Julián Castro for Mayor Campaign may continue to make expenditures to maintain its existence and meet any state requirements, including ongoing reporting requirements. However, once confirmed and during my tenure as Secretary, I will not participate in the operation or decision-making of this entity, and I personally will not solicit, accept or receive funds for it and will not use its funds to engage in any partisan political activities.

I am also associated with the Texas Tomorrow PAC. If confirmed for the position of Secretary of the Department of Housing and Urban Development, Texas Tomorrow PAC will become dormant; during my tenure as Secretary, any funds associated with this entity will be used only for expenditures related to maintaining it. During my tenure as Secretary, the PAC will not accept or receive any funds.

My spouse is a salaried employee of the Northside Independent School District. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my spouse's compensation or employment with Northside Independent School District. I also will not participate personally and substantially in any particular matter involving specific parties in which Northside Independent School District is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I understand that as an appointee I am required to sign the Ethics Pledge (Exec. Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this and any other ethics agreement.

Finally, 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 other ethics agreements of Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to be 'JC' or similar initials, written in a cursive style.

Julián Castro