

February 7, 2019

Ms. Susan E. Daniel
Designated Agency Ethics Official
International Joint Commission
United States Section
1717 H. Street NW, Ste. 835
Washington, D.C. 20006

Dear Ms. Daniel:

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 Commissioner of the International Joint Commission.

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.

I currently serve on the Southeast Cass Water Resource Board as a Manager, the Red River Joint Water Resource District as a member of the Executive Board of Managers, and the Cass County Joint Water Resource Board as a member. Upon confirmation, I will resign from my positions with these entities. 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 I know 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 currently engage in consulting through a limited liability company, Trans Boundary Solutions (TBS), LLC which I formed. I am the President and sole employee of TBS, LLC. Upon confirmation, TBS, LLC will cease engaging in any business including consulting work. Any outstanding client fees will be fixed prior to my appointment. During my appointment to the position of Commissioner of the International Joint Commission, TBS, LLC will remain dormant and will not advertise. I will not perform any services for the company, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to maintain TBS, LLC while it is in inactive status. As Commissioner, 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 TBS, LLC. In addition, I will not participate

personally and substantially in any particular matter involving specific parties in which I know that a former client of mine is a party or represents a party, for a period of one year from the date on which I last provided service to that client, unless I am authorized to participate under 5 C.F.R. § 2635.502(d).

My spouse is employed by Essentia Health-Fargo, a hospital in Fargo, North Dakota in a position for which she receives a fixed annual salary. For as long as my spouse continues to work for Essentia Health-Fargo, I will not participate personally and substantially in any particular matter involving specific parties in which I know Essentia Health-Fargo 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 or municipal bonds that qualify for the exemption at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will meet in person with you during the first week of my service in the position of Commissioner 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,

Lance Yohe 7 February 2019

Lance Yohe