



U.S. Department of Justice

Washington, D.C. 20530

DEC 23 2016

Walter M. Shaub, Jr.
Director
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3919

Dear Mr. Shaub:

In accordance with the provisions of Title I of the Ethics in Government Act of 1978, as amended, I am forwarding the financial disclosure report of Jefferson B. Sessions III. President-Elect Trump has announced his intent to nominate Senator Sessions to serve as Attorney General of the United States.

We have conducted a thorough review of the enclosed report. The conflict of interest statute, 18 U.S.C. § 208, requires that Senator Sessions recuse himself from participating personally and substantially in any particular matter in which he knows that he has a financial interest directly and predictably affected by the matter, or in which he knows that a person whose interests are imputed to him has a financial interest directly and predictably affected by the matter, unless he first obtains a written waiver, pursuant to Section 208(b)(1), or qualifies for a regulatory exemption, pursuant to Section 208(b)(2). Senator Sessions understands that the interests of the following persons are imputed to him: his spouse; minor children; any general partner of a partnership in which he is a limited or general partner; any organization in which he serves as an officer, director, trustee, general partner or employee; and any person or organization with which he is negotiating or has an arrangement concerning prospective employment. In determining whether a particular matter has a direct and predictable effect on his financial interests or on those of any other person whose interests are imputed to him, Senator Sessions will consult with Department of Justice ethics officials.

He will divest his interests in the following entities within 90 days of his confirmation: Center Coast MLP Focus C Fund, Vanguard Health Care Fund, OPI Steelpath MLP Select 40 C Mutual Fund, Petrobras International Finance Company Bond, and Petrobras Global Finance Bond. With regard to each of these entities, he will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the financial interests of the entity until he has divested it, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). He understands that he may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether he receives a Certificate of Divestiture, he will ensure that all divestitures discussed in

this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

Upon confirmation, Senator Sessions will resign from his position on the Board of Overseers of Samford University. For a period of one year after his resignation, he will not participate personally and substantially in any particular matter involving specific parties in which he knows Samford University is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Senator Sessions is the sole owner of timberland in Alabama. He will continue to have a financial interest in this property, but he will not manage it or provide any services to it other than to perform required ministerial functions such as signing any required timber deeds. Instead, he will receive only passive investment income from it. He will retain a professional forester to manage the land and negotiate any sales of timber. He will not negotiate individual sales. He will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the financial interests in this timberland, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Senator Sessions has 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.

Based on the above agreements and counseling, I am satisfied that the report presents no conflicts of interest under applicable laws and regulations and that you can so certify to the Senate Judiciary Committee.

Sincerely,

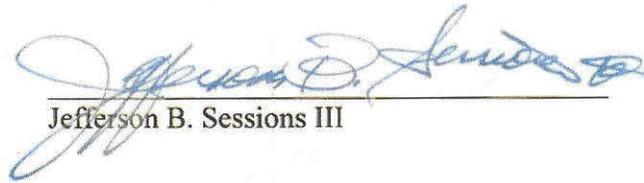


Lee J. Lofthus
Assistant Attorney General
For Administration and
Alternate Designated Agency Ethics Official

Enclosure

NOMINEE STATEMENT

I have read the attached Ethics Agreement signed by Lee J. Lofthus, Assistant Attorney General and Designated Agency Ethics Official, on 12/23, 2016, and I agree to comply with the conflict of interest statute and regulations, and to follow the procedures set forth in the agreement.



Jefferson B. Sessions III

12/13/16

Date