

## CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE <b>Robert E. Lighthizer</b>
	b. Position Title:	to be completed by OGE <b>United States Trade Representative</b>
	c. Agency:	to be completed by OGE <b>Office of the U.S. Trade Representative</b>
	d. Date Ethics Agreement Signed:	to be completed by OGE <b>January 31, 2017</b>
	e. Date Confirmed:	to be completed by OGE <b>May 11, 2017</b>
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE <b>August 16, 2017</b>
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  Filing Date(s) of OGE Form 278-T Report(s): <i>08/02/2017</i>
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

6. Recusals	a. <i>I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No
	b. <i>I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	c. <i>I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
7. Waivers and Authorizations	a. <i>I received a waiver pursuant to 18 U.S.C. § 208.</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	Date: Financial interest:
	b. <i>I received a waiver pursuant to Executive Order 13770.</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	Date: Subject:
c. <i>I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No	
If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	Date: Covered person(s):	
d. <i>I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No	
If yes, indicate the date of the waiver and identify the former employer or payer.	Date: Former employer or payer:	

Robert E. Lighthizer

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable:</p> <p><input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I forfeited it.</p>
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</p> <p>If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.</p>		<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>
	<p>I have signed the ethics pledge pursuant to Executive Order 13770.</p> <p>If you are a SGE or career FSO or previously signed the pledge, select N/A.</p>		<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>
<p>10. Additional Ethics Agreement Requirements</p>	<p>to be completed by OGE</p>	<p>to be completed by appointee</p> <p>I am complying with these requirements as described in the adjacent box.</p> <p><input type="radio"/> Yes    <input type="radio"/> No    <input checked="" type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>	<p>I divested my entire interest in the Granite Small Core Equity Fund and the Todd Large Cap Intrinsic Value Fund on July 24, 2017. OGE has granted an extension until October 5, 2017, to complete divestment of my entire interest in the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.</p>		
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p>I certify that the information I have provided is complete and accurate.</p>	<p>Appointee's Signature:</p> <p><i>Robert E. Lighthizer</i></p>		<p>Date:</p> <p>8/2/17</p>

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



July 31, 2017

Janice Kaye  
Chief Counsel for Administrative Law and  
Designated Agency Ethics Official  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, NW  
Washington, DC 20508

Dear Ms. Kaye:

This letter is in response to your letter to the U.S. Office of Government Ethics (OGE) dated July 27, 2017. In your letter, you requested that the due date for Ambassador Robert E. Lighthizer to comply with his ethics agreement be extended to October 5, 2017. Your request was prompted by the restrictions associated the Ambassador's holdings in the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.

OGE granted the Ambassador a Certificate of Divestiture for these holdings on July 27, 2017. In your letter, you explain that, because of restrictions on capital account activity, the next opportunity the Ambassador will have to complete divestment will not arise until October 2017.

OGE approves your request to extend the Ambassador's compliance due date to October 5, 2017, but only as it applies to the Ambassador's holdings in the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.

The Ambassador must still comply with the remaining requirements of his ethics agreement by the original due date of August 9, 2017, and submit a Certification of Ethics Agreement Compliance regarding those requirements by August 16, 2017.<sup>1</sup> He must also submit a second Certification of Ethics Agreement Compliance by October 12, 2017, to demonstrate compliance with all ethics agreement requirements, including the divestitures of the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account. Finally, we remind you that the Ambassador's recusal obligations with respect to the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account remain in effect until divestiture of the relevant holdings has been completed.

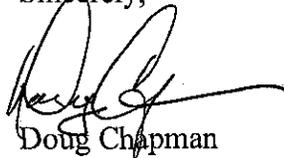
<sup>1</sup> Although OGE will post this letter with the Ambassador's first certification, we suggest the Ambassador also make note of the extension approval in Box 11 (Comments of Appointee).



Ms. Janice A. Kaye  
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If you have any questions, please contact me at 202-482-9223 or [ecompliance@oge.gov](mailto:ecompliance@oge.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Chapman", written over a faint, illegible background.

Doug Chapman  
Chief, Program Review Branch  
Compliance Division

## CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

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	e. Date Confirmed:	to be completed by OGE <b>May 11, 2017</b>
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE <b>October 12, 2017</b>
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  Filing Date(s) of OGE Form 278-T Report(s): <i>10/11/2017</i>
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No</p>
	<p>b. I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No      <input type="radio"/> N/A</p>
	<p>c. I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No      <input type="radio"/> N/A</p>
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	<p>b. I received a waiver pursuant to Executive Order 13770.</p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Subject:</p>
	<p>c. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Covered person(s):</p>
	<p>d. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Former employer or payer:</p>

Robert E. Lighthizer

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<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p><i>I certify that the information I have provided is complete and accurate.</i></p>	<p>Appointee's Signature: <i>Robert E Lighthizer</i></p>		<p>Date: 10/05/2017</p>