

Date: May 12, 2025

Richard C. Visek
Principal Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
Department of State

Re: Ethics Undertakings

Dear Mr. Visek

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 Representative of the United States of America to the United Nations for Management and Reform (with the rank of Ambassador), Department of State. 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 addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to the impartiality regulations at 5 C.F.R. Part 2635, Subpart E.

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 direct the account manager or investment professional to obtain 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), obligations of the United States, or municipal bonds. I will monitor whether the account manager or investment professional is following this direction regarding prior approval.

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 – LAST LINE STRATEGIES LLC

I am the sole proprietor of my consulting firm, which does business as Last Line Strategies LLC. Upon confirmation, my consulting firm will cease engaging in any business, including the representation of clients. During my appointment to the position of Representative of the United States of America to the United Nations for Management and Reform, the firm will remain dormant and will not advertise. I will not perform any services for the firm, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the firm while it is in an inactive status. As Representative of the United States of America to the United Nations for Management and Reform, 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 Last Line Strategies LLC. In addition, pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – POSITIONS WITH ENTITIES IN WHICH I HAVE EQUITY

Upon confirmation, I will resign from my positions with:

- 1229-1247 N. 27th Street Partners LLC
- 825 East Lancaster Partners II LP
- JBCB Brewertown LLC
- KB Lancaster Avenue LLC
- North 27th Street Partners LLC

I will continue to have a financial interest in these entities, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from

them. 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 any of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 4 – ESB HOLDINGS LLC

I am the Managing Member of ESB Holdings LLC. Upon confirmation, ESB Holdings LLC will cease engaging in any business. During my appointment to the position of Representative of the United States of America to the United Nations for Management and Reform, ESB Holdings LLC will remain dormant and will not advertise. I will not perform any services for ESB Holdings LLC, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the ESB Holdings LLC while it is in an inactive status. As Representative of the United States of America to the United Nations for Management and Reform, 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 ESB Holdings LLC.

SECTION 5 – JAB ENERGY SERVICES LLC

Upon confirmation, I will resign from my position as President of JAB Energy Services LLC. As soon as practicable but not later than 90 days after my confirmation, I will divest my financial interest in this entity by transferring my interest in JAB Energy Services LLC to my spouse. 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 this entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I have verified that I will be able to carry out the divestiture within the timeframe described above.

SECTION 6 – FOXLANE HOMES LLC

I serve as an expert witness for Foxlane Homes LLC. Upon confirmation, I will cease serving as an expert witness. All amounts owed to me by Foxlane Homes LLC will be fixed before I assume the duties of the position of Representative of the United States of America to the United Nations for Management and Reform, and I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Foxlane Homes LLC to pay me. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after ceasing to provide these services, I will not participate personally and substantially in any particular matter involving specific parties in which I know Foxlane Homes LLC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 7 – OTHER RESIGNATIONS

Upon confirmation, I will resign from my position with the following entities:

- Trafalgar Community Association, Inc.
- SemCap Food and Nutrition Fund

I previously resigned from my positions on the board of directors of Pennsylvania 30 Day Fund, Inc. and IBung, Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, 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).

SECTION 8 – THE SHERYL G. BARTOS REVOCABLE TRUST

I will retain my position as a trustee of The Sheryl G. Bartos Revocable Trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Representative of the United States of America to the United Nations for Management and Reform. 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 The Sheryl G. Bartos Revocable Trust, 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).

SECTION 9 – DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the following entities:

- Alphabet
- Apple
- Citigroup
- Coca Cola
- Goldman Sachs Group Inc.
- JPMorgan Chase
- Merck
- Meta Platforms Inc.
- Palantir Technologies Inc.

With regard to each of these entities, 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 the entity until I have divested it, 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

I will also divest my interest in Financial Select Sector SPDR Fund as soon as practicable but not later than 90 days after my confirmation. Until I have completed this divestiture, 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 any holding of Financial Select Sector SPDR Fund that is invested in the financial services sector, 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 have verified that I will be able to carry out the divestiture within the timeframe described above.

I understand that I 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 I receive a Certificate of Divestiture, I 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. I understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) will not repurchase any asset I was required to divest without consulting with my agency ethics official and the U.S. Office of Government Ethics.

SECTION 10 – DE MINIMIS EXEMPTION FOR SECURITIES

If I rely on a de minimis exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the de minimis threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

SECTION 11 – SPOUSE EMPLOYMENT

My spouse owns and I serve as a Senior Advisor for FMG Operating Company LLC, a residential construction business. Upon confirmation, I will resign from my position as Senior Advisor. 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 FMG Operating Company LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I also will not participate personally and substantially in any particular matter involving specific parties in which I know a 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 12 – 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,



Jeffrey Bartos