

May 29, 2026

Heather C. Gottry
Designated Agency Ethics Official
and Director, Departmental Ethics Office
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Ms. Gottry:

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 Assistant Secretary for Fish and Wildlife and Parks of the Department of the Interior. 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 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 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 that qualify for the regulatory exemption for diversified

mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

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 – CORIENT PRIVATE WEALTH, LLC

I previously resigned from my position as Vice Chairman and Partner of Corient Private Wealth, LLC in June 2025, and have no outstanding payments owed to me. I was permitted to retain my fee-free investment accounts with Corient Private Wealth, LLC. I also was permitted to retain my common shares of Corient Private Wealth, LLC that were issued to me during my tenure with the company. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.503, for a period of two years after my receipt of this payment, I will not participate personally and substantially in any particular matter involving specific parties in which Corient Private Wealth, LLC is a party or represents a party, unless I first receive a written waiver, pursuant to 5 C.F.R. § 2635.503(c). 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).

SECTION 3 – TEXAS STATE GUARD

I am currently a Colonel with the Texas State Guard in an inactive non-pay status in which I will not be called to active duty during my appointment. I will retain this position and the inactive non-pay status during my appointment. 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 Texas State Guard, 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 4 – TEXAS ALCOHOLIC BEVERAGE COMMISSION

I previously resigned from my position as Chairman of the Texas Alcoholic Beverage Commission. 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 the Texas Alcoholic Beverage Commission is a

party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 5 – KEVIN & LESLEY LILLY FOUNDATION

Upon confirmation I will resign from my position with the Kevin & Lesley Lilly Foundation. My spouse is also employed by the Kevin & Lesley Lilly Foundation. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, or for as long as my spouse continues to work for Kevin & Lesley Lilly Foundation, whichever is later, I will not participate personally and substantially in any particular matter involving specific parties in which I know Kevin & Lesley Lilly Foundation is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 6 – RESIGNATION FROM LLCs

Upon confirmation, I will resign my position with the following LLCs, and I will become a non-managing member of these entities:

- 41 Roaring Fork, LLC
- KJL Associates, LLC

During my appointment. I will not manage these entities or provide any other services to them. Instead, I will receive only passive investment income from them. As Assistant Secretary, 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 7 – OTHER RESIGNATIONS

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

- Southwestern University Board of Trustees
- Family Trust #1
- Family Trust #2
- Family Trust #3
- Family Trust #4
- Family Trust #5
- Family Trust #6
- Family Trust #7

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, 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).

SECTION 8 – DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my equity interests in the entities identified on Attachment A. 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.

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

- Dominion Energy Inc., bond
- PPL Corporation, bond

With regard to each of these bonds, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the marketability or market resale value of the bond or on the ability or willingness of the issuer to pay their debt obligations to me 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.

SECTION 9 – CYNOSURE AVALON BUILDGROUP, LLC

I have an equity interest in and capital commitments to Cynosure Avalon BuildGroup, LLC. As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in Cynosure Avalon BuildGroup, LLC, including my capital commitments. 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 fund or its underlying holdings until I have divested it and any capital commitment, 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.

SECTION 10 – CERTIFICATE OF DIVESTITURE & ASSET REPURCHASES

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 11 – RETAINED FINANCIAL INTERESTS

I have been advised that the duties of the position of Assistant Secretary for Fish and Wildlife and Parks may involve particular matters affecting the financial interests of the following entities:

- Avalon Carlyle Private Equity Fund I LP
- LongueVue Capital Partners II, LP
- LongueVue Capital Partners III, LP
- LongueVue Capital Partners IV, LP
- Grupo Cuervo, LLC
- Avalon Investment Partners, LLC – Class 2020 HS LTC

The agency has determined that it is not necessary at this time for me to divest my interests in these entities because the likelihood that my duties will involve any such matter is remote. Accordingly, with regard to 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, or its underlying holdings for as long as I own 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).

Additionally, the agency has determined that it is not necessary at this time for me to divest financial interests in publicly traded securities other than those identified for divestiture in this Ethics Agreement because my recusal from particular matters in which these interests potentially pose a conflict of interest because the likelihood that my duties will involve any such matter is remote. If I rely on a de minimis exemption under 5 C.F.R. § 2640.202 with regard to any of my retained 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 12 – AGENCY SPECIFIC REQUIREMENTS

If I am confirmed as Assistant Secretary for Fish and Wildlife and Parks for the U.S. Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the U.S. Department of the Interior extended to me by supplemental regulation, 5 C.F.R. § 3501.103(b). Therefore, I will not hold any such interests during my appointment to the position of Assistant Secretary – Fish and Wildlife and Parks for the U.S. Department of the Interior. Finally, I understand that my spouse and I must also comply with the requirements in 5 C.F.R. § 3501.103(c).

SECTION 13 – 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,

Kevin Lilly

Attachment A

- Accenture PLC
- Advanced Micro Devices, Inc.
- Air Products and Chemicals, Inc.
- Alphabet, Inc.
- American Tower Corporation
- Apple, Inc.
- Berkshire Hathaway, Inc.
- BHP Group Limited
- BHP Billiton, Ltd.
- Broadcom, Inc.
- Caterpillar Inc.
- Chevron Corp.
- Cisco Systems, Inc.
- ConocoPhillips
- Cummins Inc.
- Deere & Company
- Duke Energy Corporation
- Exxon Mobil Corporation
- Iron Mountain Incorporated
- International Business Machines Corporation
- Johnson Controls International PLC
- Lam Research Corporation
- Linde PLC
- Martin Marietta Materials, Inc.
- Meta Platforms, Inc.
- Microsoft Corp.
- Phillips 66
- Netflix, Inc.
- NVIDIA Corp.
- Oracle Corporation
- Sempra
- Stryker Corporation
- Tesla, Inc.
- Texas Instruments Incorporated
- Vail Resorts, Inc.
- Valero Energy Corporation
- The Williams Companies, Inc.
- Avalon Global Real Assets Fund, LP
- Genesis Park II LP

- Buffalo Bayou Resources V LP
- SeaOne Corp.
- Avalon Investment Partners, LLC – Class 2020 PC (PE/V/RE)
- Avalon Investment Partners, LLC – Class Private Capital Fund II