

June 13, 2019

Daniel S. Lee
Designated Agency Ethics Official
Federal Maritime Commission
800 North Capitol St., NW
Washington, D.C. 20573

Dear Mr. Lee:

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 Federal Maritime Commission (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.

In December 2018, I terminated my consulting agreement with DCI Group, LLC (DCI). For a period of one year from the date that I terminated my agreement, I will not participate personally and substantially in any particular matter involving specific parties in which I know that DCI is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of DCI for whom I provided services to 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).

Upon confirmation, I will submit the appropriate papers with the State of Maryland to effectuate the dissolution of Bentzel Strategies, LLC (the Company). Since 2017, when the company was created and registered, the company has never generated any income nor has it had active clients. Additionally, upon my confirmation I will take down the company's website and any and all other advertising or promotional material, publications, blogs, invoicing forms, company letterhead, photographs and biographies on this or any other public-facing website. Until dissolution and removal of the website have been completed, 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 company, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon my confirmation, I will terminate my consulting agreements with Hydrogen Energy California, LLC, a wholly owned subsidiary of SCS Energy, LLC (HECA), and Specialized

Carriers and Rigging Association (SCRA), and cease to provide any and all consulting services. Any outstanding consulting fees due and owing to me at that time will be fixed before I assume the duties of Commissioner of the Federal Maritime Commission. 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 HECA or SCRA to honor their contractual obligations and pay me these amounts. For a period of one year after my resignation from HECA and SCRA, 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).

My spouse is employed as Director of Federal Relations for West Virginia University (WVU), a position for which she receives a fixed annual salary. I will not participate personally and substantially in any particular matter involving specific parties in which I know WVU is a party or represents a party, unless I am 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 that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I will meet with you in person during the first week of my service as a Commissioner to discuss completing the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation by the United States Senate, 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.

Finally, 46 U.S.C. § 301(b)(4)(A) states that "[a] Commissioner may not have a pecuniary interest in, hold an official relation to, or own stocks or bonds of any entity the Commission regulates." The section further states that "[a] Commissioner may not engage in another business, vocation, or employment." 46 U.S.C. § 301(b)(4)(B). While holding office, I will not have any pecuniary interest in, hold any official relations to, or own stocks of any entity the Commission regulates. Further, while holding office, I will not engage in another business, vocation, or employment.

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,



Carl W. Bentzel