

22 February 2018

Judith S. Kaleta
Designated Agency Ethics Official
U.S. Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Ms. Kaleta:

I am committed to the highest standards of ethical conduct for government officials. The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest if I am confirmed for the position of Federal Transit Administrator at the Department of Transportation.

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.

Upon confirmation, I will resign from my position with the City of Norfolk. For a period of one year after my resignation, I will not participate personally and substantially in any particular matters involving specific parties in which I know that the City of Norfolk is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I previously held a position with The Healing Place which ended in September 2017. For a period of one year after the end of my service with this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know the The Healing Place 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 owns The Hampton Roads Home Team and its two subsidiaries, OSO Music LLC and Thelma Drake and Associates. I am currently the Vice President of The Hampton Roads Home Team. Upon confirmation, I will resign my position with The Hampton Roads Home Team but my spouse will continue to own and operate it and its two subsidiaries. During my appointment to the position of Federal Transit Administrator, Thelma Drake and Associates will remain dormant and will not advertise. I will not perform any services for Thelma Drake and Associates, except that I will comply with any requirements involving legal filings, taxes,

and fees that are necessary to maintain it while it is in an inactive status. I will continue to have a financial interest in these entities through my spouse's ownership of them, but I will not provide any services material to the production of income. 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 Hampton Roads Home Team, OSO Music LLC, and Thelma Drake and Associates unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

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), or obligations of the United States.

I will meet in person with you on the first day of my service in the position of Federal Transit Administrator to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. If circumstances do not permit a first-day meeting, I will meet with you during the first week of my service. Within 90 days of my confirmation, I will also document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

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 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,

A handwritten signature in cursive script that reads "Thelma Day Drake".

Thelma Day Drake