

January 14, 2025

Mr. Stuart Bender  
Designated Agency Ethics Official  
U.S. Department of Agriculture  
J.L. Whitten Building  
Room 347-W  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Mr. Bender:

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 Secretary of the U.S. Department of Agriculture. 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), obligations of the United States, or municipal bonds.

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 – EMPLOYMENT RELATED INTERESTS

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

- America First Policy Institute
- America First Works
- Texas Public Policy Foundation

Further, 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 3 – BLR IDEAS CORP

I am the sole proprietor of my consulting firm, which does business as BLR Ideas Corp. Upon confirmation, my consulting firm will cease engaging in any business, including the representation of clients. During my appointment to the position of Secretary of Agriculture, 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 Secretary of Agriculture, 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 BLR Ideas Corp. In addition, all amounts owed to me by any of my clients will be fixed before I assume the duties of the position of Secretary of Agriculture, 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 any of these clients to pay these amounts. 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 or until the client satisfies any outstanding bill, whichever is later, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

## SECTION 4 – REVOCABLE FAMILY TRUST

I will retain my position as a trustee of the Revocable Family Trust #1. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Secretary. I

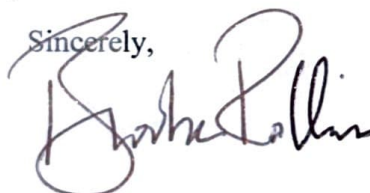
will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the Revocable Family Trust #1, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

#### SECTION 5 – SPOUSAL EMPLOYMENT

My spouse is an employee of Hillwood Energy and HKN Energy and participates in the employee net profit plans of these companies. My spouse does not hold any stock, restricted stock, stock options, or any other equity interest in Hillwood Energy or HKN Energy. Through the net profit plan with Hillwood Energy and HKN Energy, my spouse invests in HKN Energy II, LP; Hillwood Energy New Ventures, LP; Hillwood Energy Partners, LP; Hillwood Oil & Gas Operating Co., LP; Hunter Gathering, LP; and Petrus Minerals Operating Co., LP. 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 Hillwood Energy, HKN Energy, any of these LPs, or any of their underlying holdings, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

#### SECTION 6 – 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,  


Brooke Rollins