



Department of Energy

Washington, DC 20585

April 6, 2021

Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, N.W., Suite 500
Washington DC 20005-3917

Dear Mr. Rounds:

I am enclosing an amendment and supplement to David M. Turk's nominee public financial disclosure report, signed on February 1, 2021, and to his ethics agreement, signed on February 16, 2021. I have reviewed the additional information. Based on my review of this supplemental disclosure, I continue to believe that Mr. Turk is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

**SUSAN
BEARD**

Digitally signed by
SUSAN BEARD
Date: 2021.04.06
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Susan Beard
Deputy General Counsel for
Agency Operations

Enclosures

April 5, 2021

Susan Beard
Designated Agency Ethics Official
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

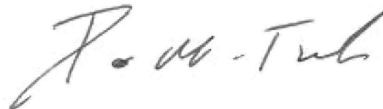
Dear Ms. Beard:

The purpose of this letter is to supplement my ethics agreement signed on February 16, 2021. In a separate document, I also am supplementing my financial disclosure report by reporting my uncompensated position with the Biden-Harris Transition Team (PT Fund, Inc.) that I inadvertently omitted from the report.

I previously resigned from my position with the Biden-Harris Transition Team (PT Fund, Inc.). Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from PT Fund, Inc., I will not participate personally and substantially in any particular matter involving specific parties in which I know PT Fund, Inc., is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have been advised that this supplement to my ethics agreement 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,

A handwritten signature in black ink that reads "D. M. Turk". The signature is written in a cursive style with a large initial "D" and a long horizontal stroke.

David M. Turk

February 16, 2021

Susan F. Beard
Designated Agency Ethics Official
U.S. Department of Energy
1000 Independence Ave., S.W., Suite 6A-211
Washington, DC 20585

Dear Ms. Beard:

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 Deputy Secretary of the U.S. Department of Energy. 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 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 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 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 understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period

of two years after I am appointed, with the exception of, among others, international organizations in which the United States is a member state.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – INTERNATIONAL ENERGY AGENCY

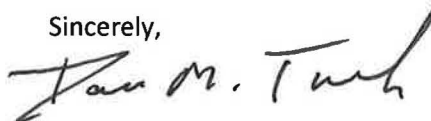
Upon confirmation, I will resign from my position with the International Energy Agency (IEA). Following my resignation, I will receive a lump sum payment pursuant to my cash balance pension plan and payment of my accrued annual leave, pursuant to IEA policy. Until I have received these payments, I will 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 IEA to provide this contractual benefit, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208 (b)(2).

For a period of one year after my resignation, I will have a “covered relationship” under the impartiality regulation at 5 C.F.R. § 2635.502 with IEA. Pursuant to 5 C.F.R. § 2635.502(d), I will seek written authorization from you, as the Department of Energy’s Designated Agency Ethics Official, to participate personally and substantially in particular matters involving specific parties in which I know IEA is a party or represents a party.

SECTION 3 – 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,

A handwritten signature in black ink that reads "David M. Turk". The signature is written in a cursive style with a large, sweeping initial "D".

David Turk