

## CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE <b>Robert E. Lighthizer</b>
	b. Position Title:	to be completed by OGE <b>United States Trade Representative</b>
	c. Agency:	to be completed by OGE <b>Office of the U.S. Trade Representative</b>
	d. Date Ethics Agreement Signed:	to be completed by OGE <b>January 31, 2017</b>
	e. Date Confirmed:	to be completed by OGE <b>May 11, 2017</b>
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE <b>August 16, 2017</b>
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  Filing Date(s) of OGE Form 278-T Report(s): <span style="color: blue; font-family: cursive;">08/02/2017</span>
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

6. Recusals	a. I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.	<input checked="" type="radio"/> Yes <input type="radio"/> No
	b. I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	c. I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
7. Waivers and Authorizations	a. I received a waiver pursuant to 18 U.S.C. § 208.	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.	Date: Financial interest:
	b. I received a waiver pursuant to Executive Order 13770.	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).	Date: Subject:
	c. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).	Date: Covered person(s):
	d. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).	<input type="radio"/> Yes <input checked="" type="radio"/> No
	If yes, indicate the date of the waiver and identify the former employer or payer.	Date: Former employer or payer:

Robert E. Lighthizer

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable:</p> <p><input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.</p> <p><input type="radio"/> I forfeited it.</p>
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305.</p> <p>If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.</p>		<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>
	<p>I have signed the ethics pledge pursuant to Executive Order 13770.</p> <p>If you are a SGE or career FSO or previously signed the pledge, select N/A.</p>		<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>
<p>10. Additional Ethics Agreement Requirements</p>	<p>to be completed by OGE</p>	<p>to be completed by appointee</p> <p>I am complying with these requirements as described in the adjacent box.</p> <p><input type="radio"/> Yes    <input type="radio"/> No    <input checked="" type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>	<p>I divested my entire interest in the Granite Small Core Equity Fund and the Todd Large Cap Intrinsic Value Fund on July 24, 2017. OGE has granted an extension until October 5, 2017, to complete divestment of my entire interest in the Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.</p>		
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p>I certify that the information I have provided is complete and accurate.</p>	<p>Appointee's Signature:</p> <p><i>Robert E. Lighthizer</i></p>	<p>Date:</p> <p>8/2/17</p>	

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS

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January 15, 2020

The Honorable Robert E. Lighthizer  
United States Trade Representative  
Office of the U.S. Trade Representative  
600 17th Street, NW  
Washington, DC 20508

Dear Mr. Lighthizer:

The U.S. Office of Government Ethics (OGE) provides the heads of each executive branch agency with year-end status reports regarding annual financial disclosure reports which are subject to OGE's certification. I am pleased to report that your agency has successfully completed the 2019 filing cycle.

Financial disclosure is the executive branch's primary tool for identifying and resolving conflicts of interest on the part of executive branch officials. Through the financial disclosure process, OGE and executive branch agencies assure the President, the Congress, and the public that officials at the highest levels of government are free from conflicts of interest. OGE thanks you, your senior leaders, and your agency's ethics officials for fully supporting OGE's review process and for making annual financial disclosure a priority.

Sincerely,

A handwritten signature in black ink that reads "Emory Rounds, III". The signature is written in a cursive style with a large, prominent initial "E".

Emory A. Rounds, III  
Director, Office of Government Ethics





April 19, 2019

The Honorable Robert E. Lighthizer  
United States Trade Representative  
Office of the U.S. Trade Representative  
600 17th Street, NW  
Washington, DC 20508

Dear Mr. Lighthizer:

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Sincerely,

A handwritten signature in black ink that reads "Emory Rounds, III". The signature is written in a cursive style with a large initial "E".

Emory A. Rounds, III  
Director, Office of Government Ethics

cc. Designated Agency Ethics Official  
for the Office of the U.S. Trade Representative



## CERTIFICATION OF ETHICS AGREEMENT COMPLIANCE

Senate Confirmed Presidential Appointee

1. Appointee's Information	a. Appointee's Name:	to be completed by OGE <b>Robert E. Lighthizer</b>
	b. Position Title:	to be completed by OGE <b>United States Trade Representative</b>
	c. Agency:	to be completed by OGE <b>Office of the U.S. Trade Representative</b>
	d. Date Ethics Agreement Signed:	to be completed by OGE <b>January 31, 2017</b>
	e. Date Confirmed:	to be completed by OGE <b>May 11, 2017</b>
	f. Due Date for Certification of Ethics Agreement Compliance:	to be completed by OGE <b>October 12, 2017</b>
2. Resignations	<i>I completed all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
3. Divestitures	a. <i>I have completed all of the divestitures indicated in my ethics agreement. I also understand that I may not repurchase these assets during my appointment without OGE's prior approval.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
	b. <i>I have filed a period transaction report, or periodic transaction reports, (OGE Form 278-T) to disclose the completion of these agreed upon divestitures.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A  Filing Date(s) of OGE Form 278-T Report(s): <i>10/11/2017</i>
4. Managed Accounts	<i>If I have a managed account or use the services of an investment professional, I have notified the manager or professional of the limitations indicated in my ethics agreement. In addition, I am continuing to monitor purchases.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
5. Interim Recusals	<i>I complied with my interim recusal obligations pending the divestitures required by my ethics agreement.</i>	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

<p>6. Recusals</p> <p><i>(Note: These factual statements describe the appointee's current status. They are not intended to modify ethics agreement commitments or create new recusal obligations.)</i></p>	<p>a. I am recusing from particular matters in which I know I have a <u>personal</u> or <u>imputed</u> financial interest directly and predictably affected by the matter, unless I have received a waiver or qualify for a regulatory exemption.</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No</p>
	<p>b. I am recusing from particular matters in which any former employer or client I served in the past year is a party or represents a party, unless I have been authorized under 5 C.F.R. § 2635.502(d).</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No      <input type="radio"/> N/A</p>
	<p>c. I am recusing from particular matters in which any former employer or client I served in the two years prior to my appointment is a party or represents a party, unless I have received a waiver under Exec. Order 13770.</p>	<p><input checked="" type="radio"/> Yes      <input type="radio"/> No      <input type="radio"/> N/A</p>
<p>7. Waivers and Authorizations</p>	<p>a. I received a waiver pursuant to 18 U.S.C. § 208.</p> <p>If yes, indicate the date of the waiver and indicate the financial interest covered by the waiver.</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Financial interest:</p>
	<p>b. I received a waiver pursuant to Executive Order 13770.</p> <p>If yes, indicate the date of the waiver and the subject of the waiver (i.e., applicable paragraph of the ethics pledge, parties, particular matters, specific issue areas, as applicable).</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Subject:</p>
	<p>c. I received an authorization pursuant to 5 C.F.R. § 2635.502(d).</p> <p>If yes, indicate date of authorization and identify the covered person(s) as to whom you have been authorized (e.g., former employer, former client, spouse's employer, spouse's current client, etc.).</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Covered person(s):</p>
	<p>d. I received a waiver pursuant to 5 C.F.R. § 2635.503(c).</p> <p>If yes, indicate the date of the waiver and identify the former employer or payer.</p>	<p><input type="radio"/> Yes      <input checked="" type="radio"/> No</p> <p>Date:</p> <p>Former employer or payer:</p>

Robert E. Lighthizer

<p>8. Payments, Accelerations, or Divestitures Required to be Completed Prior to Entering Government Service</p>	<p>Mark this box if not applicable: <input checked="" type="checkbox"/></p>	<p>a. If I committed that I would forfeit a financial interest or payment, unless it was received or accelerated prior to my assumption of the duties of the government position:</p>	<p><input type="radio"/> I received it (or it was accelerated) <u>prior to</u> my assumption of the duties of the position.  <input type="radio"/> I received it (or it was accelerated) <u>after</u> my assumption of the duties of the position.  <input type="radio"/> I forfeited it.</p>
<p>9. Requirements for Regular Appointees</p>	<p>I have completed my initial ethics briefing, pursuant to 5 C.F.R. § 2638.305. If you are a Special Government Employee (SGE) or career Foreign Service Officer (FSO), select N/A.</p>	<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>	
<p>Requirements for Regular Appointees</p>	<p>I have signed the ethics pledge pursuant to Executive Order 13770. If you are a SGE or career FSO or previously signed the pledge, select N/A.</p>	<p><input checked="" type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>	
<p>10. Additional Ethics Agreement Requirements</p>	<p>to be completed by OGE</p>	<p>to be completed by appointee I am complying with these requirements as described in the adjacent box. <input type="radio"/> Yes    <input type="radio"/> No    <input type="radio"/> N/A</p>	
<p>11. Comments of Appointee</p>	<p></p>		
<p>Any intentionally false or misleading statement or response provided in this certification is a violation of law punishable by a fine or imprisonment, or both, under 18 U.S.C. § 1001.</p>			
<p>I certify that the information I have provided is complete and accurate.</p>	<p>Appointee's Signature: <i>Robert E. Lighthizer</i></p>	<p>Date: 10/05/2017</p>	

UNITED STATES OFFICE OF  
GOVERNMENT ETHICS



December 18, 2017

The Honorable Robert E. Lighthizer  
Ambassador  
Office of the U.S. Trade Representative  
600 17th Street, NW  
Washington, DC 20508

Dear Ambassador Lighthizer:

On April 14, 2017, the U.S. Office of Government Ethics (OGE) announced that it would provide the heads of executive branch agencies with year-end status reports regarding annual financial disclosures subject to OGE's certification. I am pleased to report that your agency has successfully completed the 2017 filing cycle.

The Ethics in Government Act requires that by May 15 each year covered senior agency leaders<sup>1</sup> must file public financial disclosure reports, which their agencies review for conflicts of interest and compliance with disclosure requirements. The agencies then must timely forward these reports to OGE for certification. When requested by OGE, agencies also must promptly obtain any additional information needed for certification. Your agency has completed this process for the 2017 filing cycle.

Financial disclosure is the executive branch's primary tool for identifying and resolving conflicts of interest on the part of executive branch officials. Through the financial disclosure process, OGE and executive branch agencies assure the President, the Congress, and the public that officials at the highest levels of government are free from conflicts of interest. OGE applauds you, your senior leaders, and your agency's ethics officials for making annual financial disclosure a priority.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Christopher", written over a horizontal line.

Dale Christopher  
Deputy Director for Compliance

cc. Designated Agency Ethics Official  
for the Office of the U.S. Trade Representative

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<sup>1</sup> Covered senior agency leaders include all Senate-confirmed Presidential appointees to federal positions, except for special government employees and members of the uniformed services. Designated Agency Ethics Officials are also included.

