

June 9, 2017

Ms. Katherine D. McManus
Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
Department of State

Re: Ethics Undertakings

Dear Ms. McManus:

I am committed to the highest standards of ethical conduct for government officials. If confirmed as the Ambassador to the Holy See, 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.

My spouse and I have provided client services in the past through Gingrich Productions, Inc., and my husband may continue to do so. Upon confirmation, I will resign from my position with Gingrich Productions, Inc. My spouse and I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. 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 Gingrich Productions, Inc., unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). 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, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I also will not participate personally and substantially in any particular matter involving specific parties in which I know a client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I am the Vice Chairman and an owner of Elected.org, an entity that has no assets and generates no income, and that is currently in the process of being dissolved. Upon confirmation I will resign my position with Elected.org, and I will not perform any services for the entity, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to dissolve the entity. Until Elected.org is completely dissolved, 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 entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I also will resign from my positions with the following entities: The Gingrich Foundation, Inc., the Windy Hill Court Homeowners Association, and the Choir of the Basilica of the National Shrine of the Immaculate Conception. 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).

Before learning of my consideration for a possible nomination to a position as the Ambassador to the Holy See, I entered into an agreement with Regnery Publishing to write a children's book, *Remember the Ladies*. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of the Ambassador to the Holy See if the Senate confirms my nomination. I will not participate personally and substantially in any particular matter involving specific parties in which I know Regnery Publishing is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will retain my position as a trustee of the Callista Gingrich Revocable Trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Ambassador to the Holy See. 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 Callista Gingrich Revocable Trust, 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).

My spouse is a Senior Advisor at Dentons US, LLP, from which he receives a consulting fee. For as long as my spouse continues to work at Dentons US, LLP, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the firm, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I will not participate personally and substantially in any particular matter involving specific parties in which I know Dentons US, LLP or any client of my spouse 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, for the duration of my appointment to the position of the Ambassador to the Holy See, my spouse has agreed not to communicate directly with the United States Embassy in Holy See on behalf of Dentons US, LLP or any client.

My spouse also provides consulting services to Barrick Gold, for which he receives a consulting fee and stock options. 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 Barrick Gold, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of Blue Ridge Networks, for which he receives stock options and an advisor fee. 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 Blue Ridge Networks, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of CSC Partners LLC, for which he has received equity in the company. 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 CSC Partners LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of Pathway Genomics, for which he receives stock options. 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 Pathway Genomics, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, my spouse has a financial interest in The Lubbers Agency. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on this entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

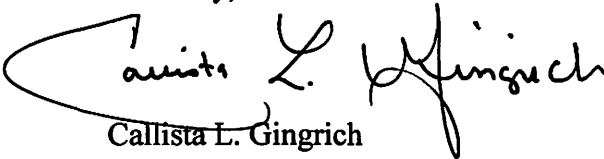
I have a managed account, and I will direct the account manager to obtain my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds. I will monitor whether the account manager is following this direction regarding prior approval.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but no later than 15 days after my appointment as required under 5 C.F.R. § 2638.305, unless granted an extension under that regulation. Within 90 days of my confirmation, 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.

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,



Callista L. Gingrich