

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

Date:

June 7, 2017

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 Republic of Singapore, 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.

I understand that a heightened prospect of a conflict of interest could exist as to companies that maintain a presence in the Republic of Singapore, because they may be more likely than other companies to seek official assistance from or make contact with the Embassy or otherwise be affected by policies and engagement implemented by the Embassy. I will remain alert to the possible need to recuse where appropriate.

Within 90 days of confirmation, I will divest my interests in the entities listed in the attachment. With regard to each of these entities, 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 until I have divested it, 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 I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

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 was a contributor to Fox News up until November 23, 2016. For a period of one year after last serving as a contributor to Fox, I will not participate personally and substantially in any particular matter involving specific parties in which I know Fox News, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I resigned from my position as Director of the Jamestown Foundation on November 28, 2016. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know the Jamestown Foundation 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 with the Department of State, I received an advance from Crown Publishing Group for a book on political science that I have completed writing. I will not perform additional work on this book or perform any other services for compensation during my appointment to the position of Ambassador to the Republic of Singapore if the Senate confirms my nomination. I will not participate personally and substantially in any particular matter involving specific parties in which I know Crown Publishing Group is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

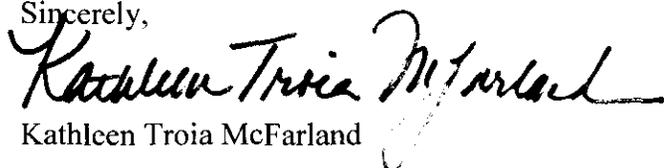
My spouse is a principal managing member of McFarland Dewey Company, LLC. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of McFarland Dewey Company, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

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.

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 must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I previously signed and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Troia McFarland". The signature is written in a cursive style with a large, sweeping flourish at the end.

Kathleen Troia McFarland

Attachment

1. 3M
2. Abbott Labs
3. Alphabet Inc.
4. Amazon.com Inc.
5. Apple Inc.
6. Bank of America Corp.
7. Bristol Myers Squibb Co.
8. Celgene Corp.
9. Chevron Corporation
10. Cisco Systems Inc.
11. Coca Cola Co.
12. Conocophillips
13. Dow Chemical Company
14. Du Pont E I De Nemours & Co.
15. Exxonmobil Corp.
16. Facebook Inc.
17. General Electric
18. Gilead Sciences Inc.
19. Goldman Sachs Group Inc.
20. Honeywell International Inc.
21. Intel Corp
22. International Business Machines Corp.
23. Johnson & Johnson
24. Kraft Heinz Co.
25. Mastercard Inc.
26. Microsoft Corp.
27. Mondelez International Inc.
28. Novartis AG Spons ADR
29. Pepsico Inc.
30. Phillips 66
31. Procter & Gamble Co.
32. Qualcomm Inc.
33. Schlumberger Ltd.
34. T Rowe Price Group Inc.
35. Thermo Fisher Scientific Inc.
36. United Technologies Corp.
37. Visa Inc.
38. Walt Disney Co.
39. Wells Fargo & Co.