

ETHICS PLEDGE

I recognize that this pledge is part of a broader ethics in government plan designed to restore and maintain public trust in government, and I commit myself to conduct consistent with that plan. I commit to decision-making on the merits and exclusively in the public interest, without regard to private gain or personal benefit. I commit to conduct that upholds the independence of law enforcement and precludes improper interference with investigative or prosecutorial decisions of the Department of Justice. I commit to ethical choices of post-Government employment that do not raise the appearance that I have used my Government service for private gain, including by using confidential information acquired and relationships established for the benefit of future clients.

Accordingly, as a condition, and in consideration, of my employment in the United States Government in a position invested with the public trust, I commit myself to the following obligations, which I understand are binding on me and are enforceable under law:

1. *Lobbyist Gift Ban.* I will not accept gifts from registered lobbyists or lobbying organizations for the duration of my service as an appointee.
2. *Revolving Door Ban — All Appointees Entering Government.* I will not for a period of 2 years from the date of my appointment participate in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients, including regulations and contracts.
3. *Revolving Door Ban — Lobbyists and Registered Agents Entering Government.* If I was registered under the Lobbying Disclosure Act, 2 U.S.C. 1601 *et seq.*, or the Foreign Agents Registration Act (FARA), 22 U.S.C. 611 *et seq.*, within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 2, I will not for a period of 2 years after the date of my appointment:
 - (a) participate in any particular matter on which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment;
 - (b) participate in the specific issue area in which that particular matter falls; or
 - (c) seek or accept employment with any executive agency with respect to which I lobbied, or engaged in registrable activity under FARA, within the 2 years before the date of my appointment.
4. *Revolving Door Ban — Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions on communicating with employees of my former executive agency set forth in section 207(c) of title 18, United States Code, and its implementing regulations, I agree that I will abide by those restrictions for a period of 2 years following the end of my appointment. I will abide by these same restrictions with respect to communicating with the senior White House staff.
5. *Revolving Door Ban — Senior and Very Senior Appointees Leaving Government.* If, upon my departure from the Government, I am covered by the post-employment restrictions set forth in sections 207(c) or 207(d) of title 18, United States Code, and those sections' implementing regulations, I agree that, in addition, for a period of 1 year following the end of my appointment, I will not materially assist others in making communications or appearances that I am prohibited from undertaking myself by (a) holding myself out as being available to engage in lobbying activities in support of any such communications or appearances; or (b) engaging in any such lobbying activities.
6. *Revolving Door Ban — Appointees Leaving Government to Lobby.* In addition to abiding by the limitations of paragraph 4, I also agree, upon leaving Government service, not to lobby any covered executive branch official or non-career Senior Executive Service appointee, or engage in any activity on behalf of any foreign government or foreign political party which, were it undertaken on January 20, 2021, would require that I register under FARA, for the remainder of the Administration or 2 years following the end of my appointment, whichever is later.
7. *Golden Parachute Ban.* I have not accepted and will not accept, including after entering Government, any salary or other cash payment from my former employer the eligibility for and payment of which is limited to individuals accepting a position in the United States Government. I also have not accepted and will not accept any non-cash benefit from my former employer that is provided in lieu of such a prohibited cash payment.
8. *Employment Qualification Commitment.* I agree that any hiring or other employment decisions I make will be based on the candidate's qualifications, competence, and experience.
9. *Assent to Enforcement.* I acknowledge that the Executive Order entitled "Ethics Commitments by Executive Branch Personnel," issued by the President on January 20, 2021, which I have read before signing this document, defines certain of the terms applicable to the foregoing obligations and sets forth the methods for enforcing them. I expressly accept the provisions of that Executive Order as a part of this agreement and as binding on me. I understand that the terms of this pledge are in addition to any statutory or other legal restrictions applicable to me by virtue of Federal Government service.

Signature



Date

5/26/2021

Name (Type or Print):

Eva A Milloua



Summary of the President Biden Ethics Pledge
Executive Order (E.O.) 13989
Jan. 20, 2021

Who must sign the Pledge?

- All full-time political appointees must sign the Ethics Pledge, as a condition of employment.
- “Appointee” *includes* the following personnel:
 - All full-time, non-career Presidential appointees;
 - Non-career Senior Executive Service (SES) appointees; and
 - Non-career appointees to positions excepted from the competitive service by reason of being of a confidential or policymaking character (e.g., Schedule C, politically appointed term SES or equivalent).
- This *excludes* the following personnel:
 - Career officials temporarily acting in the absence of an appointee to a non-career position;
 - Special Government Employees;
 - Uniformed service commissioned officers; and
 - Administratively Determined appointees

What are the restrictions of the Pledge?

1. **Lobbyist Gift Ban:** You may not accept *gifts* from *registered lobbyists* or *lobbying organizations* for the duration of your Government appointment. Pledge para. 3.
 - “Registered lobbyist” is any individual registered with the Clerk of the House of Representatives and the Secretary of the Senate. Interpretive guidance provides that this lobbyist gift ban does not apply to media organizations or not-for-profit entities exempt from taxation under 26 U.S.C. § 501(c)(3).
 - “Lobbying organization” is any entity that employs at least one in-house lobbyist on its own behalf. This includes the major defense contractors.
 - “Gifts” are most items of value; examples are free attendance at dinners and other meals, receptions, sporting events, and similar widely-attended gatherings. This includes a gift which is solicited or accepted indirectly, with your knowledge (e.g., by your parents, siblings, spouse, children, dependent relative, member of your household, or a person or an organization that you specifically designate).
 - Exclusions from this definition of gifts include, but are not limited to:
 - Modest refreshments (e.g., coffee and donuts, but not alcohol);
 - Items of little intrinsic value (e.g., greeting card, plaque) intended solely for presentation;
 - Benefits available to all Government employees or all uniformed military personnel.
 - The *only* gift exceptions applicable to the Ethics Pledge are:
 - Gifts based on a personal relationship;
 - Discounts and similar benefits;
 - Gifts resulting from a spouse’s business or employment;
 - Customary gifts/gratuities provided by a prospective employer;