

March 12, 2018

Ed McDonnell
Alternate Designated Agency Ethics Official
U.S. Department of the Interior
1849 C Street, NW, MS 5311
Washington, DC 20240

Dear Mr. McDonnell:

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 Assistant Secretary – Indian Affairs of the Department of the Interior.

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), or statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). 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.

Upon confirmation, I will resign from my position with the Arctic Slope Regional Corporation. Following my departure, the Arctic Slope Regional Corporation will issue me payments pursuant to the Arctic Slope Regional Corporation Employee Incentive Program and the Arctic Slope Regional Corporation Long-Term Incentive Plan. I will not accept any such payments and will forfeit them unless I receive those amounts before I assume the duties of the position of Assistant Secretary – Indian Affairs. For a period of two years from the date on which I receive these payments, I will not participate personally and substantially in any particular matter involving specific parties in which I know the Arctic Slope Regional Corporation is a party or represents a party, unless I first receive a written waiver pursuant to 5 C.F.R. § 2635.503(c).

I recently resigned my position with the Arctic Economic Council and the Ted Stevens Foundation. 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).

I presently own inherited shares in the Ukpeagvik Inupiat Corporation. Within 90 days of my confirmation, I will divest these shares by transferring them to my non-minor, dependent children. Until I complete the transfer of these shares, 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 Ukpeagvik Inupiat Corporation, 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), or statutory exemption, pursuant to 18 U.S.C. § 208(b)(4). Once the shares have been transferred, I will not participate personally and substantially in any particular matter involving specific parties that to my knowledge is likely to have a direct and predictable effect on the financial interests of the Ukpeagvik Inupiat Corporation, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will request a written waiver pursuant to 18 U.S.C. § 208(b)(1) regarding my inherited financial interest in the Arctic Slope Regional Corporation. Until I have obtained such a waiver, 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 this entity.

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 at 5 C.F.R. § 2640.201(a), or obligations of the United States.

If I am confirmed as Assistant Secretary – Indian Affairs of the Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the Department of the Interior extended to me by supplemental regulation 5 C.F.R. § 3501.103.

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 will meet in person with you during the first week of my service in the position of Assistant Secretary – Indian Affairs of the Department of the Interior in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. 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 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,

A handwritten signature in blue ink, appearing to read 'Tara Sweeney', with a stylized flourish at the end.

Tara Sweeney