

**FROM:** Jasmine Dickerson  
Legislative Director  
Office of Congressional Relations  
USDA

**TO:** Anne Knapke  
Deputy Assistant Secretary of Congressional Relations  
USDA

Stuart Bender  
Designated Agency Ethics Official and  
Director, Office of Ethics  
USDA

**SUBJECT:** Ethics Agreement

The purpose of this letter is to acknowledge my obligation to avoid any actual or apparent conflicts of interest with my duties as Legislative Director. The Office of Ethics did not identify any actual or apparent conflicts of interest based upon its review of the financial information in the Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e) that I submitted on March 4, 2021; nor am I currently aware of any personal circumstances that could lead to an actual or apparent conflict of interest with my duties.

### **AGREEMENT**

I understand that I am responsible to know the ethics rules applicable to me and to abide by those rules. I understand that a change in my circumstances may precipitate the need for an ethics agreement that specifically addresses the issue(s) raised by the circumstance.

**Conflicts of Interest (18 USC § 208).** As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, 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). "Particular matter," for purposes of this paragraph, includes not only matters involving a specific proceeding affecting the legal rights of the parties, such as contracts, claims, controversies, investigations, grants, loans, agreements, litigation, and other arrangements involving a specific party or parties, but also legislation, regulation, broad policymaking, and program development that are focused on a particular sector or the interests of a discrete and identifiable class of persons. 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. By law, this means that all financial interests of these persons are considered to be mine as if I owned them personally.

**General impartiality (5 CFR § 2635.502).** In addition to conflicting financial interests, I am aware that certain other financial relationships (“covered relationships”) can affect my ability to perform the duties of my position. While these covered relationships will not result in prosecution, they may, depending upon the circumstances, lead to administrative actions, including removal. Where such covered relationships exist, I understand that I may not participate in any particular matter involving specific parties in which the covered relationship is, or represents, a party, unless I am authorized to participate pursuant to 5 C.F.R. part 2635, subpart E.

“Particular matters involving specific parties,” for purposes of this section, includes only those matters in which the covered relationship is directly engaged as party or representative, such as contracts, grants, loans, agreements, litigation, and other arrangements that specifically involve the interest. However, it does NOT normally include legislation, regulation, broad policymaking, and program development even if such may directly and predictably affect the interest as one of a group or sector.

I believe that the above actions will serve to keep me free from any actual or apparent violation of conflicts laws and regulations. This agreement is effective immediately. If I have any questions regarding the scope or application of this agreement, I will consult the USDA Office of Ethics.

I have been advised that this ethics agreement, as well as my OGE Form 278 Public Financial Disclosure Report, will be available to the public upon request, consistent with ethics agreements and OGE Form 278s of other employees who file public financial disclosure reports.

Sincerely,



Jasmine Dickerson  
Legislative Director  
Office of Congressional Relations