

Date: 4/19/21

Mr. David P. Huitema  
Assistant Legal Adviser and  
Alternate Designated Agency Ethics Official  
Office of the Legal Adviser  
U.S. Department of State  
Washington, D.C. 20520

Re: Ethics Undertakings

Dear Mr. Huitema:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest during my appointment as Spokesperson, U.S. Department of State. It is my responsibility to understand and comply with commitments outlined in this agreement.

#### SECTION 1 – GENERAL COMMITMENTS

I am committed to the highest standards of ethical conduct for government officials. As required by the criminal conflicts of interest law at 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 particular 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 an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

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 the impartiality regulations at 5 C.F.R. Part 2635, Subpart E.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of states and local governments.

## SECTION 2 – EMPLOYMENT RELATED INTERESTS

Prior to my appointment, I resigned from my position with National Security Action. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, 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 National Security Action is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Also prior to my appointment I completed my contractual obligations to NBC News and to Georgetown University. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after I last rendered services to 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).

## SECTION 3 – TRUSTS AND TRUSTEE POSITIONS

I will retain my positions as trustee of the Price Credit Shelter Trust (u/t/a the Price Family Trust), the Exempt Marital Trust, the Non-Exempt Marital Trust, the Management Trust (u/t/a the Price Family Trust), the Edward Price 2012 Irrevocable Trust, the Edward Price Trust, the Sibling One Trust and the Sibling Two Trust. 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 these entities, 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).

In the past I have received trustee fees from the Price Credit Shelter Trust (u/t/a the Price Family Trust), the Exempt Marital Trust, the Non-Exempt Marital Trust, and the Management Trust (u/t/a the Price Family Trust). I am a non-career member of the Senior Executive Service and, as such, I understand that I am considered to be a covered non-career employee as provided for in 5 C.F.R. Part 2636 so that I am barred from earning outside earned income in any calendar year attributable to that calendar year which exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. Further, I understand that this amount is calculated on a pro rata basis for individuals who become employees after January 1 of any calendar year. *Id.* Accordingly, I have in writing informed the Price Credit Shelter Trust (u/t/a the Price Family Trust), the Exempt Marital Trust, the Non-Exempt Marital Trust, and the Management Trust (u/t/a the Price Family Trust) of this limitation. I will not accept trustee fees,

or any other outside earned income, which in the aggregate annually are in excess of the 15 percent limitation as provided for in 5 C.F.R. Part 2636.

(b)(6)

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Edward C. Price