

March 17, 2026

Ms. Kateland Jackson
Designated Agency Ethics Official
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave., SE
Washington, DC 20528

Dear Ms. Jackson:

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 Secretary of the Department of Homeland Security. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

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, even if uncompensated; 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.

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 regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), or obligations of the United States.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will submit my

Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics (OGE) pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – RESIGNATIONS

Upon confirmation, I will resign from my positions with the following entities:

- Mullin Family Holdco LLC
- M8 Holdings LLC
- M8 Holdings II LLC
- M8 Holdings IV LLC
- Legacy RV Resort LLC

I will continue to have a financial interest in these entities, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from them. 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 any of these entities, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my positions with the entities listed below. I will continue to have a financial interest in these entities, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from them. I have been advised that the duties of the position of Secretary may involve particular matters affecting the financial interests of the following entities:

- Mullin Properties LLC
- Mullin Realty LLC
- Mullin Ranch LLC
- Mullin Properties West Division LLC

The agency has determined that it is not necessary at this time for me to divest my interests in these entities because my recusal from particular matters in which these interests pose a conflict of interest will not substantially limit my ability to perform the essential duties of the position of Secretary. Accordingly, 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 any 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). I understand that substantial participation includes both recommendations and the rendering of advice.

Upon confirmation, I will resign from my positions with the following entities:

- Mullin Plumbing New Construction

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, 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).

SECTION 3 – RETAINED POSITIONS

I will retain my position as a trustee of The Markwayne Mullin and Christie Renee Mullin Living Trust, dated June 22, 2010 (Mullin Living Trust). I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Secretary. 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 Mullin Living Trust, 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 will retain my position with Circle 6 Rodeo Co. LLC. During my appointment to the position as Secretary, I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. 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 Circle 6 Rodeo Co. LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I will retain my position with Allotment Services LLC. I have been advised that the duties of the position of Secretary may involve particular matters affecting the financial interests of Apres Spectrum LLC, which is owned by Allotment Services, LLC. The agency has determined that it is not necessary at this time for me to divest my interest in Apres Spectrum LLC because the likelihood that my duties will involve any such matter is remote. Accordingly, with regard to Allotment Services 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 this entity for as long as I own it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 4 – DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the entities listed in Attachment A. 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the bonds listed in Attachment B. With regard to each of these bonds, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the marketability or market resale value of the bond or on the ability or

willingness of the issuer to pay their debt obligations to me 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 have verified that I will be able to carry out the divestitures within the timeframe described above.

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 understand that I must submit my request for a Certificate of Divestiture to allow for adequate time for OGE to process the Certificate of Divestiture, and in order to divest assets within the agreed upon timeframe.

I (including my spouse and minor children if applicable) will not repurchase any asset I was required to divest without my consultation with my agency ethics official and the U.S. Office of Government Ethics.

SECTION 5 – PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 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,



The Honorable Markwayne Mullin

Encl:
Attachment A
Attachment B

Attachment A

- Adobe Inc. (ADBE)
- Alphabet (GOOG/GOOGL)
- Amazon (AMZN)
- American Express (AXP)
- Amkor Technology Inc (AMKR)
- APi Group Corporation (APG)
- Apple Inc. (AAPL)
- Applied Materials Inc (AMAT)
- BlackRock Inc (BLK)
- Boston Scientific (BSX)
- Capital One Finl Corp (COF)
- Carpenter Technology Corp (CRS)
- Caterpillar Inc (CAT)
- Chevron Corp (CVX)
- Citigroup (C)
- Citizens Bancshares (CZBS)
- Coca Cola (KO)
- ConocoPhillips (COP)
- Costco (COST)
- Deere & Co (DE)
- Elevance Health Inc (ELV)
- Eli Lilly and Company (LLY)
- Emerson Electric (EMR)
- FirstCash Holdings Inc (FCFS)
- Goldman Sachs (GS)
- Hilton Worldwide Holdings Inc (HLT)
- Humphreys Fund I REIT
- Intercontinental Exchange Inc (ICE)
- Intuitive Surgical Inc (ISRG)
- IQVIA Holdings Inc (IQV)
- JPMorgan Chase & Co (JPM)
- KLA Corp (KLAC)
- L3Harris Technologies Inc (LHX)
- Lam Research Corp (LRCX)
- LPL Financial Holdings Inc (LPLA)
- Mastercard Inc (MA)
- McKesson Corp (MCK)
- Meta Platforms Inc (META)
- Microsoft Corp (MSFT)
- Monolithic Power Systems (MPWR)
- Nvidia Corp. (NVDA)
- Oneok Inc (OKE)

- Palo Alto Networks Inc (PANW)
- Parker-Hannifin Corp (PH)
- Pentair PLC SHS (PNR)
- Philip Morris Intl. Inc. (PM)
- Procter and Gamble Co (PG)
- RTX Corp (RTX)
- S&P Global Inc (SPGI)
- Salesforce Inc. (CRM)
- ServiceNow Inc. (NOW)
- Sherwin-Williams Co (SHW)
- Stride Inc (LRN)
- The Home Depot (HD)
- Thermo Fisher Scientific Inc (TMO)
- TJX Cos Inc New Com (TJX)
- Union Pacific Corp Com (UNP)
- UnitedHealth Group Inc (UNH)
- Valero Energy Corp New Com (VLO)
- Vanguard Utilities Fund (VPU)
- Visa Inc (V)
- VSE Corp (VSEC)

Attachment B

- Alamogordo N Mex Mun Sch Dist No 001
- Austin Tex CTFS Oblig
- Clear Creek Tex Indpt Sch Dist Unltd Tax Ref Bds
- Clear Creek Tex Indpt Sch Dist Unltd Tax Ref Bds
- Cook Cnty Ill Cmnty Cons Sch Dist No 015 Palatine Go Bds
- Corsicana Tex Combination Tax and Rev CTFS Oblig
- Florida St Dept Gen Svcs Div Facs Mgmt Rev Pool Rev Ref Bds
- Fort Lauderdale Fla Wtr & Swr Rev Bds Prospect Lake Wtr Treatment
- Fort Smith Ark Wtr & Swr Rev Ref Constr Bds
- IPS Multi-Sch Bldg Corp Ind Unltd Ad Valorem Ppty Tax First Mtg Bds
- Kentucky St Ppty & Bldgs Commn Revs Bds
- Macomb Inter Sch Dist Mich Unltd Tax Go Bldg Site Bds
- Massachusetts St Dev Fin Agcy Rev Bds Tufts Medicine Inc
- Metropolitan Transn Auth N Y Dedicated Tax Fd Green Fd Bds B-1 Green Bond
- Nevada St Ltd Tax Go Cap Impt Bds NVIDIA Corp (NVDA)
- Salem NH Go Bds
- Seattle Wash Drain & Wastewater Rev Ref Rev Bds
- University Houston Tex Univ Revs Consolidated Rev And Ref
- West Palm Beach Fla Cmnty Redev Agcy