



U.S. Department of Justice

Justice Management Division

Washington, D.C. 20530

Eric Ueland
Acting Director
Office of Government Ethics
250 E Street, SW, Suite 750
Washington, DC 20024

Dear Acting Director Ueland:

The purpose of this letter is to forward the attached amendment to Jeanine Pirro's ethics agreement dated July 13, 2025. Ms. Pirro explains in her letter dated November 19, 2025, the reason for the amendment is as follows:

Blackstone company is unable to fulfill the required divestiture of two assets within 90 days of Ms. Pirro's confirmation. This is due to the company's quarterly redemption policy. The company has confirmed that they will be able to meet the deadline for divestiture if it is extended to December 31, 2025.

As the Alternate Designated Agency Ethics Official of the Department of Justice, I have reviewed the updated information contained in the amendment and based upon my review of this and the prior commitments made by Ms. Pirro in her ethics agreement, I continue to believe that Ms. Pirro is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,


Digitally signed by WILLIAM TAYLOR
Date: 2025.11.20 18:10:46 -05'00'

William N. Taylor II
Deputy Assistant Attorney General
for Management and Compliance
Alternate Designated Agency Ethics Official

Attachment(s)



U.S. Department of Justice

Jeanine Ferris Pirro
United States Attorney
District of Columbia

Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 19, 2025.

Dear Ms. Lauria:

The purpose of this letter is to amend my ethics agreement signed on July 13, 2025. In accordance with my agreement to divest the assets below, it has come to my attention that I will not be able to divest the assets in a timely manner based on the company's routine quarterly redemption deadlines. This is due to the government shutdown. I am amending SECTION 6 as follows:

As soon as practical, but no later than the dates provided, I will divest my interests in the following entities:

- Blackstone Infrastructure Strategies L.P., by November 30th, 2025
- Blackstone BCRED, by December 31st, 2025

With regard to each of these funds, 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 fund or its underlying holdings 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 have been advised that this amendment to my ethics agreement 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,

Jeanine Ferris Pirro
United States Attorney

July 13, 2025

Jolene A. Lauria
Designated Agency Ethics Official
Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530

Dear Ms. Lauria,

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 United States Attorney for the District of Columbia. 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 determining whether I have an actual or potential conflict of interest during my appointment, I will consult with the Executive Office for United States Attorneys (EOUSA), General Counsel's Office, and will follow the procedures outlined in the United States Attorneys' Procedures, (USAP) 3-2.170.001, et seq. 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 – CONFLICTS OF INTEREST REVIEW AND COUNSELING

I have been advised that the duties of the position of United States Attorney may involve particular confidential matters identified by the United States Attorney's Office (USAO) that may affect my financial interests. EOUSA has determined that it is not necessary at this time for me to divest my financial interests 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 United States Attorney. Immediately upon confirmation, EOUSA will prepare recusals for all particular matters in which I will not be granted a waiver or will not qualify for a regulatory exemption.

I have been informed that the USAO has conducted a conflict review and has found no additional conflicts of interest. Should additional conflicts arise, I will seek the necessary waiver(s) or implement the necessary recusal(s) immediately upon my confirmation. An appropriate screening mechanism will be identified and immediately upon my appointment, all necessary USAO personnel will be advised in writing of all matters in which I may not participate. The notification will specifically list the matters and identify the Acting United States Attorney for those matters.

If I rely on a de minimis exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value of interests affected by a particular matter increases and exceeds the de minimis threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

If I rely on a de minimis exemption under 5 C.F.R. § 2640.201(b) with regard to any of my financial interests in sector mutual funds, I will monitor the value of those interests. If the aggregate value of my interests in sector mutual funds that concentrate in any one sector exceeds \$50,000, 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 holdings of the funds that are in the specific sector in which the funds concentrate, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

SECTION 3 – PRIOR POSITIONS

I previously resigned from my position with the following entities:

- Fox News Channel
- WABC Radio
- Ava Maria Law School

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 4 – JUDGE JEANINE DESIGNS LLC

I will retain my unpaid position as President of Judge Jeanine Designs, LLC, which is currently dormant. During my appointment to the position of U.S. Attorney, the company will remain dormant and will not advertise. I will not perform any services for the company, except that I will comply with any court orders or subpoenas and any requirements involving legal filings, taxes, and fees that are necessary to maintain the company while it is in an inactive status. As U.S. Attorney, 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 Judge Jeanine Designs, LLC.

SECTION 5 – JUDGE JEANINE PIRRO INC

I will retain my unpaid position as President of Judge Jeanine Pirro Inc. Upon confirmation, my firm will cease engaging in any consulting business or paid speaking engagements, and instead it will only receive my book royalties and manage my investments. I will not at any time receive compensation for services that I perform during my Federal appointment. 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 Judge Jeanine Pirro Inc, or its underlying holdings, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 6 – DIVESTITURES

As soon as practicable but not later than 90 days after my confirmation, I will divest my interests in the following entities:

- Ares Capital Corporation
- Barings BDC Inc.
- Blackstone BCRED

- Blackstone Infrastructure Strategies L.P.

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, or its underlying holdings 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 following funds:

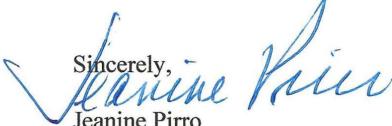
- Financial Select SPDR Fund
- Health Care Select SPDR Fund

Until I have completed these divestitures, 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 holdings of the funds that are in the specific sector in which the funds concentrate, 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.

SECTION 7 – 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,

Jeanine Pirro