

April 26, 2017

**FROM:** REBECKAH ADCOCK  
Senior Advisor to the Secretary  
USDA

**TO:** STUART BENDER  
Designated Agency Ethics Official and  
Director, Office of Ethics  
USDA

**SUBJECT:** Ethics Agreement

The purpose of this letter is to set forth the steps that I will take to avoid any actual or apparent conflict of interest with my duties as Senior Advisor to the Secretary at the U.S. Department of Agriculture. The following agreement is designed to address potential ethics problems identified by the Office of Ethics based upon its review of the financial information provided by me in my OGE 278 Public Financial Disclosure report. This agreement may be modified by the agency as it deems necessary.

#### AGREEMENT

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). 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.

On April 21, 2017, I resigned from my position with CropLife America. 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 CropLife America, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse is employed as by Computer Systems Group LLC, an information technology sector business that provides services to Federal sector clients such as the Department of Defense, but does not contract with USDA. For as long as my spouse works for the Computer Systems Group LLC, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the Computer Systems Group Ltd. I also will not participate personally and substantially in any particular matter involving specific parties in which I know the Computer Systems Group LLC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

#### Trump Administration Ethics Pledge Commitments

I understand that as a Trump Administration appointee I must continue to abide by the Ethics Pledge (Exec. Order No. 13770) that I signed on April 24, 2017. I am bound by its requirements and restrictions in addition to the commitments I have made in this ethics agreement, which may overlap. Of particular note in the Ethics Pledge:

1. I agreed not to participate in any particular matter involving specific parties that is directly and substantially related to my former employer, CropLife America, including regulations and contracts for a period of 2 years from the date of my appointment.

This provision of the Ethics Pledge essentially extends the “cooling off” regarding my former employer imposed by 5 C.F.R. § 2635.502, as outlined above, from one year to two years. As such, I will not participate in any particular matter involving specific parties that is directly and substantially related to CropLife America until April 21, 2019.

2. I agreed not to participate for a period of 2 years from the date of my appointment in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls. Over the past two years, I lobbied on the pieces of legislation listed below:

- H.R. 5, Regulatory Accountability Act of 2017
- H.R. 953, Reducing Regulatory Burdens Act of 2017
- H.R. 1430, HONEST Act
- H.R. 1431, EPA Science Advisory Board Reform Act of 2017
- H.R. 897, Reducing Regulatory Burdens Act of 2015
- H.R. 291, W21
- H.R. 594, Waters of the United States Regulatory Overreach Protection Act of 2015
- H.R. 813, Fixing Operations of Reservoirs to Encompass Climatic and Atmospheric Science Trends Act
- H.R. 1460, Focused Reduction of Effluence and Stormwater runoff through Hydrofracking Environmental Regulation Act of 2015
- H.R. 896, Regulatory Certainty Act of 2015
- H.R. 644, Trade Facilitation and Trade Enforcement Act of 2015
- H.R. 2596, Intelligence Authorization Act for Fiscal Year 2016
- H.R. 1314, Trade Act of 2015
- H.R. 2576, TSCA Modernization Act of 2015
- H.R. 1732, Regulatory Integrity Protection Act of 2015
- H.R. 2029, Consolidated Appropriations Act for Fiscal Year 2016
- H.R. 897, Zika Vector Control Act
- H.R. 2577 Military Construction, Veteran's Affairs, and Related Agencies Appropriations Act, 2017
- S. 697, Frank R. Lautenberg Chemical Safety for the 21st Century Act
- S. 176, W21
- S. 659, Bipartisan Sportsmens Act of 2015
- S. 1269, Trade Facilitation and Trade Enforcement Act of 2015
- S. 998, American Manufacturing Competitiveness Act of 2015
- S. 995, Bipartisan Congressional Trade Priorities and Accountability Act of 2015
- S. 1500, Sensible Environmental Protection Act of 2015
- S. 1140, Federal Water Quality Protection Act

More specifically, my lobbying efforts over the past two years were focused on the following specific issue areas:

- the impact of crop protection products (including herbicides, fungicides and insecticides) on water;

- the impact of crop protection products on human health; and
- international trade matters related to the regulation of chemicals.

I was not involved in lobbying efforts related to the following issue areas:

- the impact of crop protection products on the environment;
- the Endangered Species Act of 1973; and
- pollinators.

Accordingly, as per the terms of the Trump Administration Ethics Pledge, I will not participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area, as identified above, in which that particular matter falls until April 25, 2019.

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.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rebeckah', with a long, sweeping horizontal line extending to the right.

Rebeckah Adcock

Senior Advisor to the Secretary, USDA