

Date

July 6, 2009

Mr. James H. Thessin  
Deputy Legal Adviser and  
Designated Agency Ethics Official  
U.S. Department of State  
Washington, D.C. 20520-6310

Re: Ethics Undertaking Letter

Dear Mr. Thessin:

I am committed to the highest standards of ethical conduct for government officials. If confirmed as the Permanent Representative of the United States of America to the Organization of American States, with the rank of Ambassador, 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 other person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to section 208(b)(1), or qualify for a regulatory exemption, pursuant to section 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.

Upon confirmation, I will resign from my position with the Organization of American States (OAS). I will have a covered relationship for a period of one year under 5 C.F.R. §2635.502 with the OAS. I will seek authorization pursuant to 5 C.F.R. §2635.502(d) to participate in particular matters involving specific parties in which the OAS is a party or represents a party. I will also seek a waiver of the similar restrictions in paragraph 2 of the Ethics Pledge required under Exec. Order 13490.

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I am a participant in the OAS Retirement and Pension Plan. Pursuant to the terms of that plan, upon my resignation from the OAS, I will receive a lump sum distribution of all my accrued benefits under that plan. Until I receive this

payment, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of the OAS to provide this contractual benefit to me, unless I first obtain a written waiver, pursuant to section 208(b)(1), or qualify for a regulatory exemption, pursuant to section 208(b)(2).

Upon confirmation, I will also resign from my positions with the National Center for Missing and Exploited Children, the Center for Women Policy Studies, PROLEAD/Inter-American Development Bank, the International Planning Committee for the Global Summit of Women, and the Arlington County Multi-Cultural Advisory Commission. 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 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).

I understand that a heightened prospect of a conflict of interest could exist as to companies that maintain a presence in the Western Hemisphere because they may be more likely than other companies to seek official assistance from or make contact with the U.S. Mission to the Organization of American States. I will remain alert to the possible need for recusal where appropriate.

Within 90 days of confirmation, I will document the recusals of this ethics agreement by designating in writing an individual to screen me out of conflicting matters and to reassign those matters, providing the individual with a list of assets and parties giving rise to such conflicts, and notifying you when I have completed these implementing actions.

I understand that as an appointee I am required to sign the Ethics Pledge (Exec. Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this and any other ethics agreement.

Finally, I will provide the appropriate officials with the list of those interests I have retained or may acquire in order to support my efforts to avoid conflicts of interest. 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 5 C.F.R. Part 2635, Subpart E.

Sincerely,

*Carmen Lomellin*

Carmen Lomellin

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