



U.S. Department of Justice

Washington, D.C. 20530

JUN 21 2013

Walter M. Shaub, Jr.
Director
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, DC 20005-3919

Dear Mr. Shaub:

In accordance with the provisions of Title I of the Ethics in Government Act of 1978 as amended, I am forwarding the financial disclosure report of James B. Comey. President Obama has announced his intent to nominate Mr. Comey to serve as the Director, Federal Bureau of Investigation, Department of Justice.

We have conducted a thorough review of the enclosed report. The conflict of interest statute, 18 U.S.C. § 208, requires that Mr. Comey recuse himself from participating personally and substantially in any particular matter that has a direct and predictable effect on his financial interests or the financial interests of any other person whose interests are imputed to him, unless he first obtains a written waiver, pursuant to Section 208(b)(1), or qualifies for a regulatory exemption, pursuant to Section 208(b)(2). Mr. Comey understands that the interests of the following persons are imputed to him: his spouse; minor children; any general partner of a partnership in which he is a limited or general partner; any organization in which he serves as an officer, director, trustee, general partner or employee; and any person or organization with which he is negotiating or has an arrangement concerning prospective employment. In determining whether a particular matter has a direct and predictable effect on his financial interests or on those of any other person whose interests are imputed to him, Mr. Comey will consult with Department of Justice ethics officials.

Upon confirmation, Mr. Comey will resign from his positions with Columbia University and HSBC Group plc. For a period of one year after his resignation from each of these entities, he 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 he is first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

Mr. Comey resigned from his position with Bridgewater Associates, LP in January 2013. Before Mr. Comey assumes the duties of the position of Director, he will receive a full payout of all of his interests in Bridgewater Associates, LP Phantom Equity (Profit Sharing Plan), in two payments in the amount of \$163,000 and \$3,072,654, respectively. For a period of one year after his resignation, he will not participate personally and substantially in any particular matter

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involving specific parties in which Bridgewater Associates, LP is a party or represents a party, unless he is first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

Mr. Comey will receive a lump sum payout of his pension on his 55th birthday, under the Lockheed Martin Defined Benefit Pension Plan. Mr. Comey will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of Lockheed Martin to make this payment to him, unless he first obtains a written waiver pursuant to 18 U.S.C. § 208(b)(1).

We have advised Mr. Comey that because of the standard of conduct on impartiality at 5 C.F.R. § 2635.502, he should seek advice before participating in any particular matter involving specific parties in which a member of his household has a financial interest or in which someone with whom he has a covered relationship is or represents a party.

Mr. Comey will divest his interests in the entities listed on Attachment A to this ethics agreement, within 90 days of his confirmation. With regard to each of these entities, he will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the entity until he has divested it, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). Mr. Comey understands that he may be eligible to request a Certificate of Divestiture for these assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether he receives a Certificate of Divestiture, he will divest these assets within 90 days of his confirmation and will invest the proceeds in non-conflicting assets.

Mr. Comey has been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics, with other ethics agreements of Presidential nominees who file public financial disclosure reports.

Mr. Comey understands that as an appointee he is required to sign the Ethics Pledge (Exec. Order No. 13490) and that he will be bound by the requirements and restrictions therein in addition to the commitments he has made in this and any other ethics agreement.

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Based on the above agreements and counseling, I am satisfied that the report presents no conflicts of interest under applicable laws and regulations and that you may so certify to the Senate Judiciary Committee.

Sincerely,



Lee J. Lofthus
Assistant Attorney General
for Administration and
Designated Agency Ethics Official

Enclosures

JAMES B. COMEY ATTACHMENT A to Ethics Agreement

Lockheed Martin common

Lockheed Martin ESOP Fund

Illinois Tool Works

Exxon Mobil Corporation

Johnson & Johnson

Chevron Corp.

Pepsico

Dominion Resources

Aqua America

Berkshire Hathaway Cl B

Nestle S A Reg B ADR

Norfolk Southern Corp

Verizon Communications

Wisdomtree Chinese Yuan

Allergan Inc

Total S A Adr

Intel Corp

Teekay Lng Partners MLP

Enterprise Prd Partners MLP

Emerson Electric

Compass Minerals Intl

Kinder Morgan Energy Partners MLP

Proctor & Gamble Co

Westinghouse Air Brake Technologies

Union Pacific Corp

Coca Cola Company

CMEGroup Inc Cl A

AGL Resources

Microsoft

Baytex Energy Corp

Murphy Oil

Bhp Billiton Ltd Adr

Qualcomm

Hormel Foods Corp

Potash Corp Sask Inc

AT&T

Apple Inc

Core Labs

Deere & Co

Caterpillar Inc.

Rio Tinto Plc Spon Adr

Kroger Company

WD-40 Company

PPL Corporation

Southern Company

Du Pont E I \$3.50 Preferred

The Mosaic Company

CSX Corp

Peabody Energy Ind. Bond

University Va Muni Bond

Hewlett Packard Ind. Bond

Arcelor Mittal

Alpha Natural Res. Ind. Bond

Morgan Stanley Ind. Bond

LEXMARK INTL INC NOTE Ind. Bond

St Joe Company

Bbva US Senior Ind. Bond

Chesapeake Energy Ind. Bond

Darling Intl Inc Ind. Bond

Colgate Palmoliv Ind. Bond

Petrohawk Energ Ind. Bond

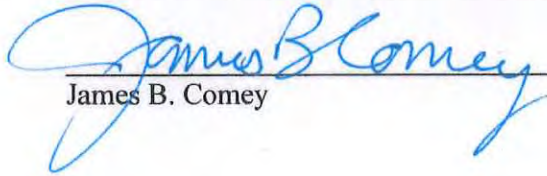
Carlyle Group LP

Markel Ind. Bond

Alcoa Ind. Bond

NOMINEE STATEMENT

I have read the attached Ethics Agreement signed by Lee J. Lofthus, Assistant Attorney General for Administration and Designated Agency Ethics Official on June 21, 2013, and I agree to comply with the conflict of interest statute and regulations, and to follow the procedures set forth in the agreement. In addition, I understand that as an appointee I am required to sign the Ethics Pledge (Exec.Order 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.


James B. Comey

June 21, 2013
Date