Cheryl A. Falvey General Counsel Consumer Product Safety Commission 4330 East West Highway, Suite 704 Bethesda, MD 20814

Dear Ms.Falvey:

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 Commissioner of the U.S. Consumer Product Safety Commission.

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 person whose interests are imputed to me, 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.

Within 90 days of my confirmation, my spouse will divest her stock interest in Walgreen Drug Stores. With regard to this asset, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of this company until my spouse has divested the stock, 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).

Effective May 17, 2009, I have resigned from my position as a member of the board of directors of Consumers Union. 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 Consumers Union is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will take an unpaid leave of absence from my position as a tenured professor at the Kenan-Flager Business School, University of North Carolina at Chapel Hill. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the University of North Carolina, unless I first obtain a written waiver, pursuant to 18 U.S.C. §208(b)(1), or qualify for either the exemption at 5 C.F.R. §2640.203(b) or another regulatory exemption, pursuant to 18 U.S.C. §208(b)(2).



My spouse is an employee of Chapel Hill Police Department. I will not participate personally and substantially in any particular matter involving specific parties in which Chapel Hill Police Department is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Finally, 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.

Sincerely,

Robert S. Adler

Robert adler