



Senator Ron Wyden
221 Dirksen Senate Office Bldg.
Washington, D.C., 20510
(202) 224-5244

June 29, 2018

Dear Senator Wyden:

I received your letter of June 21 regarding recent media reports about my divestment of stock that I previously held in Navigator Holdings, Ltd., a transoceanic shipping company. Those reports contained numerous inaccuracies and wrongful insinuations about that transaction.

Here are the facts:

- 1) I served on the board of Navigator from 2012 – 2014. Under its compensation plan for directors and officers, I received stock awards during my service as a board member. Navigator recorded these stock awards at an agent.
- 2) The Ethics Agreement into which I entered prior to my appointment as Secretary acknowledged that I could retain certain investments, including transoceanic shipping interests. All of these naturally were subject to the recusal rules.
- 3) In May 2017, I nevertheless divested the interests in Navigator of which I was then aware.
- 4) As I was completing the disposition of other assets in October 2017 as required by my Ethics Agreement, I learned of shares held on Navigator's books that I previously overlooked. I initiated a transfer of those shares to my personal account in order to divest them. I promptly sold the shares against future delivery of the certificates. The position closed as soon as my broker received those shares. I did not engage in profit-seeking short-selling as implied in the media reports; rather, I sold shares that I owned.
- 5) Navigator was only one of several divestments that I made at that time as I continued to review my records and complete dispositions as I committed to do in my Ethics Agreement.

The suggestion that a profit motive lay behind my sale of Navigator stock, or that I engaged in "insider trading" in executing that sale, is utterly false. Further, the *New York Times* article to which you refer contained no new information about Navigator's long-time commercial relationship with Sibur nor about investors in Sibur. As you surely are aware, "insider trading" under federal securities laws occurs when a person, in breach of a fiduciary duty (or other similar duty arising out of a relationship of trust and confidence) purchases or sells securities on the basis of material non-public information. That simply did not occur here.



THE SECRETARY OF COMMERCE
Washington, D.C. 20230

At all times since becoming Secretary, I have sought to comply scrupulously with federal ethics laws. I continue to rely on the Department's ethics officials for advice on compliance with those laws, including my recusals and the avoidance of any conflict of interest in my work as Secretary. I am confident that my actions with regard to Navigator were entirely proper.

I trust this information resolves any concerns that you have had based on the erroneous news reporting. Please call me if you have any further questions.

Sincerely,

A handwritten signature in black ink that reads "Wilbur L. Ross, Jr." in a cursive style.

Wilbur L. Ross, Jr.