

January 22, 2021

Mr. David P. Huitema
Assistant Legal Adviser and
Alternate Designated Agency Ethics Official
Office of the Legal Adviser
U.S. Department of State
Washington, D.C. 20520

Re: Ethics Undertakings

Dear Mr. Huitema:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest during my appointment as Senior Policy Advisor to the US Mission to the United Nations. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 – GENERAL COMMITMENTS

I am committed to the highest standards of ethical conduct for government officials. As required by the criminal conflicts of interest law at 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 particular 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 an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

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 the impartiality regulations at 5 C.F.R. Part 2635, Subpart E.

If I rely on a de minimis exemption under 5 C.F.R. § 2640.202 with regard to any of my financial interests in securities, I will monitor the value of those interests. If the aggregate value

of interests affected by a particular matter increases and exceeds the de minimis threshold, I will not participate personally and substantially in the particular matter that to my knowledge has a direct and predictable effect on the interests, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1).

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

SECTION 2 – POSITIONS

In January 2021, I resigned my positions as a Nonresident Fellow at the Brookings Institution and as a Lecturer at Princeton University. 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 either of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I will receive an outstanding payment from the Brookings Institution for contract work performed in calendar year 2020. Until I have received this payment, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of Brookings Institution to make this payment to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In December 2020, I ceased providing services as a short-term consultant for Leidos. For a period of one year after I last provided services, I will not participate personally and substantially in any particular matter involving specific parties in which I know this 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 receive royalties from Pegasus Books for sales of my 2019 book, *A Rope from the Sky*. Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, I will not participate personally and substantially in any particular matter involving specific parties in which I know Pegasus Books is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

In June 2020, I resigned my position as a Visiting Fellow at the Brookings Institution Doha Center. 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 this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).


In May 2020, I ceased providing services as a short-term consultant for the Centre for Humanitarian Dialogue. For a period of one year after I last provided services, I will not participate personally and substantially in any particular matter involving specific parties in which I know this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – ADDITIONAL COMMITMENTS

I understand that as an appointee I will be required to sign the Ethics Pledge required by an Executive Order signed by President Biden on January 20, 2021 and that I will be bound by the requirements and restrictions of that Executive Order in addition to the commitments I have made in this ethics agreement.

Sincerely, 

(b)(6)

 Joseph Zachary Vertin