

Mr. Richard C. Visek
Deputy Legal Adviser and Designated Agency Ethics Official
Office of the Legal Adviser
U.S. Department of State
Washington, DC 20520

Re:Ethics Undertakings

Dear Mr. Visek:

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 appointed as a Special Assistant to the Counselor at the Department of State. 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 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.

In addition, I will recuse myself from participating 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. § 2635.502(d).

SECTION 2 – POSITIONS

I resigned from my position as Associate with the PT Fund, Inc. in January 2021. For a period of one year after leaving my position with PT Fund, Inc., I will not participate personally and substantially in any particular matter involving specific parties in which I know the 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 served as Associate Director of Policy at National Security Action until August 2020. For a period of one year after leaving my position with this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know the National Security Action is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I provided services to InkMango Inc. as a Freelancer until July 2020. For a period of one year after ceasing to provide services for this entity, I will not participate personally and substantially in any particular matter involving specific parties in which I know the InkMango Inc. 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,

Naz El-Khatib

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1/28/2021