



United States Department of State

Washington, D.C. 20520

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Waiver Pursuant to Section 3 of Executive Order 13490

After consulting with the Counsel to the President, I hereby grant a waiver of the requirements of paragraph 2 of the Ethics Pledge to Gregory B. Starr with respect to his former employer, the United Nations, an international organization.

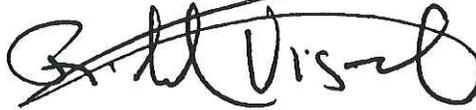
Executive Order 13490, "Ethics Commitments by Executive Branch Personnel," Section 1 (Ethics Pledge), requires all covered political appointees to abide by certain commitments. Paragraph 2 of the Ethics Pledge provides that a covered appointee may not for a period of two years from the date of his appointment participate in any particular matter involving specific parties that is directly and substantially related to his former employer. For purposes of applying this restriction, the term "particular matter" has been interpreted to include "any meeting or other communication relating to the performance of one's official duties with a former employer." DO-09-011, OGE Memorandum to Designated Agency Ethics Officials, March 26, 2009.

A waiver of the restriction contained in paragraph 2 of the Ethics Pledge may be granted upon a certification either that the literal application of the restriction is inconsistent with the purposes of the restriction or that it is in the public interest to grant the waiver. E.O. 13490, Sec. 3(a). By memorandum dated February 23, 2009, the Office of Government Ethics announced that the Designated Agency Ethics Official of each executive agency was the most appropriate designee to grant such waivers, after consultation with the Counsel to the President. *See* DO-09-008, OGE Memorandum to Designated Agency Ethics Officials, February 23, 2009.

Before his service as Assistant Secretary of State for Diplomatic Security, Mr. Starr was the Under Secretary General for Safety and Security with the United Nations, which is an international organization with 193 member states, including the United States. The United Nations' facilitates international cooperation in areas of human rights, economic development, democracy, security, among many others. Mr. Starr does not have a financial interest in the United Nations.

I have determined that this waiver is appropriate as a policy matter because it is in the strong public interest of Americans to have the Assistant Secretary coordinate with the United Nations on matters critical to the nation's security. The Assistant Secretary is a primary point of contact for coordinating the Department of State's response to threats against U.S. personnel and facilities in the United States and abroad. To this end he needs to discuss security issues of mutual concern with various high level officials in the United Nations system. Without this waiver Mr. Starr would be unable to communicate with the United Nations, which is an important partner in responding to threats shared against U.S. Government personnel and civilians and foreign diplomats. Thus, America's interest in protecting the safety and security of such individuals would be impaired.

I grant this waiver with the understanding that Mr. Starr will comply with the remaining provisions of the Ethics Pledge and with all preexisting government ethics rules. However, this waiver also serves as an authorization pursuant to 5 C.F.R. § 2635.502(d) to participate in particular matters in which the United Nations is a party or represents a party within the same parameters outlined above.



Richard C. Visek
Deputy Legal Adviser and
Designated Agency Ethics Official

Date: 11/22/13