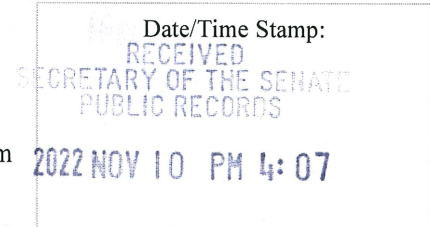


Employee Post-Travel Disclosure of Travel Expenses



Post-Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building**.

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☒ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): The International Institute for Strategic Studies

Travel date(s): October 12 - 15, 2022

Name of accompanying family member (if any): _____

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING **DID NOT INCREASE** DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate	\$2919.37			Taxi to/from airports in both Washington and Rome: \$68.89, EUR78,00; \$53.99, EUR60,00
☒ Actual Amount				

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate				
☐ Actual Amount				

Provide a description of all meetings and events attended. *See* Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): A workshop to discuss Iran's nuclear program and regional policies.

11/10/2022

(Date)

Elisa Catalano Ewers

(Printed name of traveler)

(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

11/10/2022

(Date)

(Signature of Supervising Senator/Officer)

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981
FACSIMILE: (202) 224-7416
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

October 11, 2022

Elisa Catalano Ewers
Committee on Foreign Relations
United States Senate
Washington, DC 20510

Dear Ms. Ewers:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the workshop *Geopolitics, Nuclear Issues, and the Middle East*, in Rome, Italy, on October 12–15, 2022, sponsored by the International Institute for Strategic Studies (IISS). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from IISS in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as a senior professional staff member for the Committee on Foreign Relations, and Senator Robert Menendez is your supervising Senator. IISS invited you to travel to the workshop *Geopolitics, Nuclear Issues, and the Middle East*, in Rome, Italy, on October 12–15, 2022. IISS certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. IISS has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.³

Additionally, you inform the Committee that you plan to extend your trip for a personal purpose. Based on the information you submitted, the Committee understands that, for a personal purpose, you intend to extend your trip in Rome for two days after the conclusion of officially related events. You must personally pay the cost of any additional expenses incurred as a result of extending your trip.

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² The term “necessary expenses” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

³ The term “any point throughout your trip” has a specific definition. See *Select Committee on Ethics’ Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2.

Discussion

Privately-sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110-81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately-sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately-Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor foreign trips for up to seven days. The seven-day limitation means seven 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.⁴ This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.⁵

The Committee has determined that § 501(c)(3) non-profit organizations that are classified as private foundations, as opposed to public charities, may not pay for transportation from the United States to a foreign country.⁶ However, IISS represented to the Committee that it is a § 501(c)(3) public charity, as opposed to a private foundation, pursuant to the Internal Revenue Code.⁷

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the

⁴ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 3.

⁵ See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel* at 5; see also *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

⁶ See 26 U.S.C. § 4941 et seq. Section 501(c)(3) of the Internal Revenue Code broadly defines non-profit, charitable, tax-exempt organizations. These § 501(c)(3) organizations are then further defined or designated as "public charities" and "private foundations."

⁷ 26 U.S.C. § 501(c)(3).

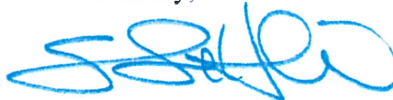
completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel**.

Consistent with these standards and Committee precedent, IISS's factual representations, and the guidance contained in this letter regarding extending your trip for a personal purpose, it appears that it is permissible for you to accept necessary expenses from IISS connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

Please be advised that the United States Constitution prohibits the acceptance of any gift, including a meal, from a foreign government without the consent of Congress. In the Foreign Gifts and Decorations Act (FGDA), Congress consented to the acceptance by federal government officials of: (1) gifts of minimal value and (2) travel or the expenses for travel taking place entirely outside the United States, from a foreign government (which includes those acting as a representative or agent of a foreign government).⁸ The Senate has defined minimal value as \$100 or less. Further, pursuant to FGDA, there are certain reporting and procedural requirements that are imposed upon Members, officers, and employees who accept gifts from a foreign government. Please review the Committee's "Dear Colleague" letter of January 11, 2019, setting forth the items to be included in filing that report.

Finally, Senate Rule 34 requires a reporting individual⁹ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$415 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report. I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Travel Checklist

⁸ 5 U.S.C. § 7342.

⁹ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$135,468 for CY 2022) or is a political fund designee and is required to file Financial Disclosure Reports.

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Date/Time Stamp:

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Elisa Catalano

Employing Office/Committee: Senate Foreign Relations Committee

Private Sponsor(s) (list all): International Institute for Strategic Studies

Travel date(s): October 12 - 15

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): Rome Italy

Explain how this trip is specifically connected to the traveler's official or representational duties:

Traveler is the Professional Senior Staff Member managing the Middle East and North Africa portfolio for the committee. This workshop is a Track II event focused on exploring policies on Iran, the Middel East, and and regional security.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

9/29/2022
(Date)


(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Robert Menendez hereby authorize Elisa Catalano
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

9/29/2022
(Date)


(Signature of Supervising Senator/Officer)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

-
1. Sponsor(s) of the trip (please list all sponsors): The International Institute for Strategic Studies
 2. Description of the trip: This 1.5-day event seeks to discuss paths forward should negotiations to restore the nuclear deal fail.
 3. Dates of travel: October 12 - 15 or 16
 4. Place of travel: Rome Italy
 5. Name and title of Senate invitees: Elisa Catalano, Senior Professional Staff Member, SFRC
 6. I *certify* that the trip fits one of the following categories:
 - ☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 - OR -
 - ☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
 7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 - AND -
 - ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
 8. I *certify* that:
 - ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 - AND -
 - ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

- ☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

– OR –

- ☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

– OR –

- ☒ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

The International Institute for Strategic Studies conducts bi-annual track 1.5 dialogues as a part of an on going project for the Carnegie Corporation of NY titled, 'Geopolitics, Nuclear Issues and the Middle East.'

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

The IISS generates facts, produces analysis and exerts influence. This trip follows important meetings such as the UNGA and allows us to understand current trends and offer an arena for additional discussion

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

U.S. Federal Government employees are frequently invited to IISS events, which frequently include sponsorship.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

Databases and publications, host-nation support for conferences, corporate sponsorship, research work and consultancy.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
☒ Good Faith estimate ☐ Actual Amounts	\$2,500	\$1,200	\$200	

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation **or** b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

A

18. Reason for selecting the location of the event or trip

Rome is where we can most easily host Iranian participants in Europe due to an existing relationship with the Italian embassy.

19. Name and location of hotel or other lodging facility:

Rome Cavalieri, Waldorf Astoria Hotel - Via Alberto Cadlolo 101 - 00136 Rome.

20. Reason(s) for selecting hotel or other lodging facility:

Existing relationship with Hilton/Waldorf Astoria chain hotels for bi-annual dialogue events.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Costs are within the Federal Govt FY 23 per diem and flight rates.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Coach.

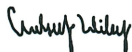
23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

N/A.

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor:



Name and Title: Ms Chelsey Wiley, Program Administrator and Research Analyst

Name of Organization: The International Institute for Strategic Studies

Address: 2121 K Street NW, Suite 600, Washington, DC 20037, USA

Telephone Number: +1 (202) 659-1490

Fax Number: N/A

E-mail Address: chelsey.wiley@iiss.org



GEOPOLITICS, NUCLEAR ISSUES AND THE MIDDLE EAST

ROME, ITALY

13-14 OCTOBER 2022

The workshop will take place at Rome Cavalieri, Waldorf Astoria Hotel - Via Alberto Cadlolo 101 - 00136

Discussions strictly not for attribution

DRAFT AGENDA

THURSDAY, 13 OCTOBER 2022

- | | |
|---------------|---|
| 14:00 – 15:30 | Lunch |
| 15:30 – 15:45 | Introduction and welcoming remarks |
| 15:45 – 17:00 | Session 1: The state of nuclear negotiations:
<i>Chair: William Alberque</i> <ul style="list-style-type: none">• Outstanding Issues• Is it time to move beyond the JCPOA? |
| 17:00 – 17:15 | Coffee break |
| 17:15 – 18:30 | Session 2: Identifying key issues and dynamics in U.S. Iran relations
<i>Chair: Mahsa Rouhi</i> |
| 20:00 | Dinner at Rome Cavalieri |

FRIDAY, 14 OCTOBER 2022

- | | |
|---------------|---|
| 09:30 – 10:00 | Arrival and coffee |
| 10:00 – 11:00 | Session 1: State of play from Tehran's perspective
<i>Chair: Mahsa Rouhi</i> <ul style="list-style-type: none">• What are Iran's key expectations? |

- How would Iran respond to either success or failure in nuclear talks?
- How and to what extent is Tehran's decision-making influenced by domestic politics in the U.S. and in Iran?

11:00 – 11:15 Coffee break

11:15 – 12:30 Session 2: State of play from Washington's perspective

Chair: Dana Allin

- What does Washington expect Iran to do next?
- How will Washington respond to Iran's likely next steps?
- How and to what extent is Washington's decision-making influenced by domestic politics in the U.S. and in Iran?

12:30 – 14:00 Lunch

14:00 – 15:15 Session 3: The role of Europe, Russia, and China:

Chair: William Alberque

- Implications of Russia-Ukraine war
- Will Russia or China abandon their longstanding non-proliferation policies?

15:15 – 15:45 Coffee Break

15:45 – 17:30 Session 4: Regional implications of success or failure of nuclear talks

Chair: Mahsa Rouhi

- What are the regional perceptions on relations with Iran; with the U.S.?
- How would the success or failure of the nuclear talks affect regional policies and approaches towards Iran?
- How will Iran react if the U.S. returns to maximum pressure on the one hand, or to incentives and diplomacy on the other?

19:30 Dinner at [TBD]

Ewers, Elisa Catalano (Foreign Relations)

From: STAC <stac@iiss.org>
Sent: Thursday, September 8, 2022 9:32 AM
To: Ewers, Elisa Catalano (Foreign Relations)
Subject: Invitation: 'Geopolitics, Nuclear Issues and the Middle East' Rome Workshop

Dear Ms Ewers,

The International Institute for Strategic Studies (IISS) invites you to our upcoming workshop on "*Geopolitics, Nuclear Issues and the Middle East*," to be held in **Rome, Italy** on **13 and 14 October 2022** at Rome Cavalieri, A Waldorf Astoria Hotel (*Via Alberto Cadlolo 101 - 00136 Roma*).

The workshop, a Track II event, will seek to discuss paths forward should negotiations to restore the nuclear deal fail, the possibility of designing a new nuclear agreement and the goals of the United States and Iran for such an agreement. The discussions will be strictly off the record. A detailed agenda will be shared in the coming weeks.

The IISS will be able to cover airfare up to premium economy, when available, hotel accommodation for the nights of 12-14 October. A travel booking request form can be found attached.

We would be grateful if you could let us know **by 19 September** whether you will be able to attend by replying to stac@iiss.org. We do hope you will be able to accept this invitation and look forward to welcoming you in Rome.

Sincerely,

Dr Dana H. Allin
Editor *Survival*; Senior Fellow for US
Foreign Policy and Transatlantic Affairs
IISS

Dr Mahsa Rouhi
Associate Fellow, Strategy, Technology
and Arms Control Programme
IISS

www.iiss.org

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Strategy, Technology & Arms Control

The International Institute for Strategic Studies

Arundel House, 6 Temple Place, London WC2R 2PG