

MEMORANDUM

April 24, 2017

To: David G. Marwell, Executive Director
T. Jeremy Gunn, General Counsel

From: Dennis J. Quinn, Designated Agency Ethics Officer

Subject: Ethics Opinion Concerning Dr. William Joyce's Participation in Review Board Issues Involving Princeton University

I. Background

At your request, I have reviewed the applicable ethical provisions concerning the degree to which Dr. William Joyce may participate in ARRB matters dealing with the Library at Princeton University; as well as other libraries. As I understand it, the Review Board may be making decisions regarding "assassination records," as defined by 44 U.S.C. § 2107 and 36 C.F.R. § 1400, that are on deposit with various libraries, including the Library at Princeton University. If it is determined that these papers contain assassination records, the Review Board may be obligated to obtain the records for inclusion in the JFK Assassination Records Collection. The Princeton Library, on the other hand, may have legal and or policy reasons that may prevent it from releasing these papers. As both a current employee of Princeton University and a member of the Review Board, Dr. Joyce is faced with a conflict of interest.

This circumstances of this situation are such that a reasonable person with knowledge of the relevant facts could question Dr. Joyce's impartiality in this matter. For these reasons, it is appropriate to determine what constraints, if any, might apply to Dr. Joyce's participation in Board decisions related to assassination records held by libraries.

II. Discussion

The Standards of Ethical Conduct require that Federal employees be impartial in performing their official duties. 5 C.F.R. § 2635.501-502