

May 7, 2025

Michael Obadal
Nominee for Under Secretary of the Army
1600 Pennsylvania Ave. NW
Washington, DC 20500

Dear Mr. Obadal:

I write regarding reports that, if confirmed as Under Secretary of the Army, you intend to retain your financial interests in Anduril Industries, Inc., a weapons manufacturing company that has significant business with the Department of Defense (DoD). This financial connection, and your holdings in other defense contractors, will compromise your ability to serve with integrity, raising a cloud of suspicion over your contracting and operational decisions. If confirmed, you must resolve these conflicts and divest your financial interests in Anduril.

The American people will expect you to manage the U.S. Army's operations¹ — consisting of a \$186 billion budget,² over 100,000 contracts each year,³ and over one million personnel⁴ — solely in the public's interest. By attempting to serve in this role with conflicts of interest, you risk spending taxpayer dollars on wasteful DoD contracts that enrich wealthy contractors but fail to enhance Americans' national security. To avoid these conflicts, I request that you divest from your equity and investments in defense contractors, recuse from matters involving your former clients and employers for four years, and agree not to work as a lobbyist or join the industries that you worked with at DoD for at least four years after you leave office.

You currently serve as a Senior Director at Anduril and have hundreds of thousands of dollars in equity in the company.⁵ Your ties to Anduril present a textbook conflict of interest. Anduril is a

¹ 10 U.S.C. 7015.

² U.S., Army, "Army Fiscal Year Budget Overview 2025," March 11, 2024, <https://www.asafm.army.mil/Portals/72/Documents/BudgetMaterial/2025/pbr/Army%20FY%202025%20Budget%20Overview.pdf>.

³ Army Contracting Command, "About U.S. Army Contracting Command," [https://acc.army.mil/about/#:~:text=Capabilities%20&%20Mission%20Execution&text=As%20an%20international%20business%20enterprise,at%20more%20than%20\\$84.5%20billion](https://acc.army.mil/about/#:~:text=Capabilities%20&%20Mission%20Execution&text=As%20an%20international%20business%20enterprise,at%20more%20than%20$84.5%20billion).

⁴ U.S. Army, "FY2025 President's Budget Highlights," p. 17, <https://www.asafm.army.mil/Portals/72/Documents/BudgetMaterial/2025/pbr/Army%20FY%202025-Budget%20Highlights.pdf>.

⁵ Office of Government Ethics, "Executive Branch Personnel: Public Financial Disclosure Report (OGE Form 278e) 278," Michael Obadal, p. 3, on file with the Office of Senator Elizabeth Warren; Office of Government Ethics, Letter from Michael Obadal to Department of Defense Alternate Designated Agency Ethics Official Danica Irvine, April 11, 2025, p. 2, [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/22D2862F18C6328885258C6F002C8B8D/\\$FILE/Obadal%2C%2](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/22D2862F18C6328885258C6F002C8B8D/$FILE/Obadal%2C%2)

defense start-up with lucrative DoD contracts to manufacture and sell weapons to the U.S. military.⁶ In February, the Army announced Anduril would take over a \$22 billion contract to produce high-tech headsets.⁷ This contract is just one example of how, as the Army's Chief Operating Officer, you could influence decisions that affect Anduril — and that could boost your own private sector fortune. According to your financial disclosure forms, you plan to “retain [your] vested restricted stock units” (RSUs) in Anduril, valued at between \$250,000 and \$500,000.⁸ You also disclosed that you may exercise the RSUs “if there is an equity event such as the sale of the company, or the company becoming a publicly traded entity.”⁹ Indeed, reports suggest that Anduril is currently eyeing an initial public offering (IPO), particularly if it can secure more Pentagon contracts.¹⁰ In short, you plan to retain Anduril equity while making decisions that can impact Anduril's profits and stock value — and, in turn, increase your own wealth. Ethics experts have called this a clear conflict of interest that is “unheard of for a presidential appointee in the Defense Department.”¹¹

To avoid this conflict, I ask that you divest from your equity in Anduril. Only through divestiture can you sufficiently mitigate this serious conflict. Your recusal plan alone will not do so — particularly given the “significant risk . . . of crossing [the] line” and participating (even inadvertently) in work that impacts Anduril,¹² and particularly when the conflict arises from Army work that does not fit the narrow definition of a “particular matter” and therefore does not trigger recusal obligations. As the Office of Government Ethics has explained, “divestiture is strongly preferred” over recusal, because it “has the benefit of being a complete remedy that forecloses any possibility that an employee will participate in a particular matter that will affect the employee's financial interest,” and it “decreases the risk that the public may question the integrity of agency programs and operations.”¹³

Even after divesting, you should still also recuse from specific-party matters involving Anduril. If you were to participate in a decision about an Anduril contract, your prior employment relationship with the company would lead the public to reasonably question whether you were more motivated to protect the company's interests than the public interest. Your predecessor, Gabe Camarillo, and other

0Michael%20%20finalEA.pdf; Executive Gov, “Trump Nominates Anduril's Michael Obadal as Army Under Secretary,” Elodie Collins, March 13, 2025, <https://executivegov.com/2025/03/michael-obadal-army-under-secretary-nomination/>; The Intercept, “Trump's pick for a top army job works at a weapons company – and won't give up his stock,” Sam Biddle, May 1, 2025, <https://theintercept.com/2025/05/01/trump-army-anduril-mike-obadal-ethics/>.

⁶ Anduril, “Transforming US & allied military capabilities with advanced technology,” <https://www.anduril.com/mission/>.

⁷ Reuters, “Anduril takes over Microsoft's \$22 billion US Army headset program,” February 11, 2025, <https://www.reuters.com/technology/anduril-takes-over-microsofts-22-billion-us-army-headset-program-2025-02-11/#:~:text=Anduril%20will%20assume%20control%20over,data%20for%20artificial%20intelligence%20training.>

⁸ Office of Government Ethics, “Executive Branch Personnel: Public Financial Disclosure Report (OGE Form 278e) 278,” Michael Obadal, p. 7, on file with the Office of Senator Elizabeth Warren.

⁹ *Id.*

¹⁰ Motley Fool, “Anduril Could IPO Soon. But What Does Anduril Even Do?” February 24, 2025, <https://www.nasdaq.com/articles/anduril-could-ipo-soon-what-does-anduril-even-do>.

¹¹ The Intercept, “Trump's Pick for a Top Army Job Works at a Weapons Company—and Won't Give Up His Stock,” Sam Biddle, May 1, 2025, <https://theintercept.com/2025/05/01/trump-army-anduril-mike-obadal-ethics/>.

¹² *Id.*

¹³ U.S. Office of Government Ethics, “Legal Advisory 23-15: U.S. Office of Government Ethics Review of Nominees for Presidentially Appointed, Senate-Confirmed Positions,” December 20, 2023, [https://www.oge.gov/Web/oge.nsf/Legal%20Docs/2190D2188533B35185258A8B0073A5ED/\\$FILE/LA-23-15%20-%20U.S.%20Office%20of%20Government%20Ethics%20Review%20of%20Nominees%20for%20Presidentially%20Appointed.%20Senate-Confirmed%20Positions.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/2190D2188533B35185258A8B0073A5ED/$FILE/LA-23-15%20-%20U.S.%20Office%20of%20Government%20Ethics%20Review%20of%20Nominees%20for%20Presidentially%20Appointed.%20Senate-Confirmed%20Positions.pdf?open).

former DoD officials, including former Secretary of Defense Lloyd Austin and former Secretary of the Air Force Frank Kendall, voluntarily agreed to recuse from their former employers' specific-party matters for four years.¹⁴ You should do the same.

Third, I ask that you commit to divest from stock in other major defense contractors. Through a Roth IRA, you own stock in several large defense contractors, including up to \$15,000 in each of the following: Cummins Inc., Thermo Fisher Scientific, and Eli Lilly (which, until recently, was a top DoD contractor).¹⁵ You also own up to \$15,000 in one of DoD's top-ten largest contractors, General Dynamics Corp.¹⁶ If you make any operational decisions that impact these companies, the public will have reason to question your impartiality. To protect the integrity of your decision-making, you should divest from these defense contractor holdings.

Fourth, you should commit not to seek compensation from any company that the Army contracts or otherwise interacts with, for at least four years after leaving office. For example, if you were to leave DoD and immediately join a defense tech company that contracts with the Army, the public would reasonably question whether the decisions you made in office were influenced by the prospect of future compensation from a defense contractor, or whether you were cashing in on your executive-branch connections to assist the company in obtaining new contracts. To mitigate such apparent conflicts of interest, prior appointees have agreed to a cooling-off period before seeking compensation from a company that works with the appointee's agency. For example, Dan Caine, Chairman of the Joint Chiefs of Staff, has committed not to work for major defense contractors after leaving government.¹⁷ Several other officials have similarly agreed not to work for companies their agencies work with, for four years after their service.¹⁸ By doing the same, you can mitigate concerns about your potential conflicts of interest in this role.

¹⁴ Office of U.S. Senator Elizabeth Warren, "In Response to Senator Warren's Questions, Secretary of Defense Nominee General Lloyd Austin Commits to Recusing Himself from Raytheon Decisions for Four Years," press release, January 19, 2021, <https://www.warren.senate.gov/newsroom/press-releases/in-response-to-senator-warrens-questions-secretary-of-defense-nominee-general-lloyd-austin-commits-to-recusing-himself-from-raytheon-decisions-for-four-years>; Military.com, "Warren Extracts Agreement for Nominees to Refuse Defense Industry Work for 4 Years," Oriana Pawlyk, July 13, 2021, <https://www.military.com/daily-news/2021/07/13/warren-extracts-agreement-nominees-refuse-defense-industry-work-4-years.html>.

¹⁵ Office of Government Ethics, "Executive Branch Personnel: Public Financial Disclosure Report (OGE Form 278e) 278," Michael Obadal, pp. 4-6, on file with the Office of Senator Elizabeth Warren; Pittsburgh Business Times, "Thermo Fisher Scientific wins \$350M defense contract," Paul J. Gough, August 5, 2024, <https://www.bizjournals.com/pittsburgh/news/2024/08/05/thermo-fisher-scientific-350-mil-defense-contract.html>; Eder Financial, "U.S. Department of Defense 2024 Top 25 Publicly Traded Companies Receiving Prime DoD Contracts," https://ederfinancial.org/files/galleries/DoD_Lists_2024_Top_25.pdf; Cummins, "Cummins is awarded major defense contract for power generation equipment," November 7, 2022, <https://investor.cummins.com/news/detail/586/cummins-is-awarded-major-defense-contract-for-power>.

¹⁶ Office of Government Ethics, "Executive Branch Personnel: Public Financial Disclosure Report (OGE Form 278e) 278," Michael Obadal, p. 5, on file with the Office of Senator Elizabeth Warren; Department of Defense Standards of Conduct Office, "CY 2024 -25 Five Year DOD Top 10 Contractor List (FY 2019-2023)," https://dodsoco.ogc.osd.mil/Portals/102/Documents/Conflicts/CY2024_25%20Five%20Year%20Top%2010%20List%20FY19_23.pdf?ver=rL7rlfBOc7HDK3bqt0lYaw%3D%3D.

¹⁷ Office of Senator Elizabeth Warren, "At Hearing, Warren Secures Ethics Commitment from Joint Chiefs of Staff Nominee," April 10, 2025, <https://www.warren.senate.gov/newsroom/press-releases/at-hearing-warren-secures-ethics-commitment-from-joint-chiefs-of-staff-nominee>.

¹⁸ Office of Senator Elizabeth Warren, "In Response to Senator Warren, FDFA Commissioner Nominee Dr. Robert Califf Makes Strongest Ethics Commitments of Any Senior Biden Administration Official," January 31, 2022, <https://www.warren.senate.gov/newsroom/press-releases/-in-response-to-senator-warren-fda-commissioner-nominee-dr->

Similarly, you should commit not to lobby any component of DoD for at least four years after leaving office. The rampant revolving door of former government leaders lobbying the agencies they once led, while their government relationships remain fresh, erodes Americans' faith in the federal government.¹⁹ To mitigate that concern, multiple former appointees agreed to post-employment lobbying restrictions, including Defense Secretary Lloyd Austin, IRS Chief Counsel Marjorie Rollinson, and Treasury Assistant Secretary for Investment Security Paul Rosen.²⁰ Likewise, you should commit not to lobby DoD for at least four years after leaving office, either as a formal registered lobbyist or informal "shadow lobbyist" — given that former high-level officials can leverage their influence not only by directly lobbying but through facilitating others to do so.

By making these commitments, you would increase Americans' trust in your ability to serve the public interest during your time at the Army — rather than the special interests of large DoD contractors. I urge you to demonstrate a commitment to government integrity and request that you reply to the following questions in writing by May 9, 2025:

1. Will you agree to divest your equity in Anduril?
2. Will you agree to divest your stock holdings in large defense contractors?
3. What is the precise value of your stock holdings in General Dynamics Corp, a top-10 defense contractor?
4. Will you commit to recuse for at least four years from all particular matters involving your former clients and employers?
5. Will you commit to recuse for at least four years from any acquisition policy decisions that would impact your former clients and employers?

robert-califf-makes-strongest-ethics-commitments-of-any-senior-biden-administration-official; Office of Senator Elizabeth Warren, "Senator Warren Secures Historic Ethics Commitments from NIH Nominee, Dr. Monica Bertagnolli Pledges Not to Work for Giant Pharmaceutical Companies Immediately After Government Service," August 29, 2023, <https://www.warren.senate.gov/newsroom/press-releases/senator-warren-secures-historic-ethics-commitments-from-nih-nominee-dr-monica-bertagnolli-pledges-not-to-work-for-giant-pharmaceutical-companies-immediately-after-government-service>.


¹⁹ Healthcare Dive, "'Revolving door' between HHS and industry could influence regulation, study says," Emily Olsen, September 7, 2023, <https://www.healthcaredive.com/news/revolving-door-hhs-healthcare-industry-health-affairs/692981/>.

²⁰ Office of Senator Elizabeth Warren, "In Response to Senator Warren's Questions, Secretary of Defense Nominee General Lloyd Austin Commits to Recusing Himself from Raytheon Decisions for Four Years," press release, January 19, 2021, <https://www.warren.senate.gov/newsroom/press-releases/in-response-to-senator-warrens-questions-secretary-of-defense-nominee-general-lloyd-austin-commits-to-recusing-himself-from-raytheon-decisions-for-four-years>; Office of Senator Elizabeth Warren, "Questions for Mr. Paul M. Rosen, of California, to be Assistant Secretary of the Treasury for Investment Security, Department of the Treasury, from Senator Elizabeth Warren," https://www.warren.senate.gov/imo/media/doc/paul_rosen_-_revised_responses_to_questions_for_the_record_from_senator_warren.pdf;

Office of Senator Elizabeth Warren, "At Nomination Hearing, Senator Warren Secures Unprecedented Ethics Commitments from IRS Chief Counsel Nominee," September 28, 2023, <https://www.warren.senate.gov/newsroom/press-releases/at-nomination-hearing-senator-warren-secures-unprecedented-ethics-commitments-from-irs-chief-counsel-nominee>.

6. Will you commit to neither seek nor accept a waiver from any recusal involving your former clients and employers for at least four years?
7. Will you commit not to seek employment or board membership with, or another form of compensation from, a company that the Army contracts or otherwise interacts with, for at least four years after leaving office?
8. Will you commit not to lobby DoD for at least four years after leaving office?

Sincerely,



Elizabeth Warren
United States Senator