

# Congress of the United States

Washington, DC 20515

February 18, 2026

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Acting Inspector General  
Department of Justice

Platte Moring  
Inspector General  
Department of Defense

Arne B. Baker  
Acting Inspector General  
Department of State

Loren Scieurba  
Acting Inspector General  
Department of the Treasury

Joseph V. Cuffari  
Inspector General  
Department of Homeland Security

Mark Priebe  
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Department of Education

Thomas Bell  
Inspector General  
Department of Health and  
Human Services

Nicole Murley  
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Environmental Protection Agency

Sarah Nelson  
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Department of Energy

Duane Townsend  
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Department of Commerce

Caryl Brzymialkiewicz  
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Department of the Interior

Cheryl L. Mason  
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Department of Veterans Affairs

John Walk  
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Department of Agriculture

Mitch Behm  
Inspector General  
Department of Transportation

William Kirk  
Inspector General  
Small Business Administration

Anthony D’Esposito  
Inspector General  
Department of Labor

Dear Inspectors General:

We are concerned that lobbyists-turned-officials in the Trump administration, from Attorney General Pam Bondi to “Border Czar” Tom Homan, could be using their government roles to benefit their former clients. As of last year, at least 21 former lobbyists had been appointed or nominated to senior government roles in the Trump Administration.<sup>1</sup> While federal ethics law directs federal employees not to work on matters involving clients they represented in the past year,<sup>2</sup> we are concerned that some Trump administration officials may have nevertheless done

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<sup>1</sup> Campaign Legal Center, “Stopping the Revolving Door: Preventing Conflicts of Interest from Former Lobbyists,” Madeleine Greenberg, April 24, 2025, <https://campaignlegal.org/update/stopping-revolving-door-preventing-conflicts-interest-former-lobbyists>; The Hill, “These 5 former lobbyists are poised to join Trump’s Cabinet,” Taylor Giorno, January 16, 2025, <https://thehill.com/lobbying/5087616-trump-cabinet-lobbyists/>; Rolling Stone, “Incoming Trump Border Czar’s Firm Brags About Helping Companies Get Contracts,” Naomi LaChance, December 30, 2024, <https://www.rollingstone.com/politics/politics-features/trump-border-tom-homan-firm-federal-contracts-1235219657/>.

<sup>2</sup> 5 CFR § 2635.502. The Office of Government Ethics requires Senate-confirmed officials to agree to the former-client recusal requirement in 5 CFR § 2635.502. See Office of Government Ethics, “Guide to Drafting Nominee Ethics Agreements (2024),” p. 39, October 1, 2024, [https://www.oge.gov/Web/OGE.nsf/Resources/Guide+to+Drafting+Nominee+Ethics+Agreements+\(2024\)](https://www.oge.gov/Web/OGE.nsf/Resources/Guide+to+Drafting+Nominee+Ethics+Agreements+(2024)).

so. And even when they comply with that minimal requirement, after a mere 12 months, their former-client relationships often remain fresh enough to improperly sway their decision-making.<sup>3</sup> Now, one year into the Trump Administration, the recusal obligations of senior Trump officials have expired or are about to expire.<sup>4</sup>

To address our concerns about this matter, we request that your office conduct an evaluation of any senior officials in your agency who recently worked as either registered lobbyists or less formal “shadow lobbyists” and have played a role in matters affecting their former clients. This evaluation would be consistent with your mission of “promot[ing] economy, efficiency, and effectiveness in the administration of” agency operations and “prevent[ing] and detect[ing] fraud and abuse” in programs run by your agency.<sup>5</sup>

During his first administration, President Trump issued an ethics pledge requiring lobbyists entering government to recuse themselves from issue areas on which they had lobbied within the previous two years.<sup>6</sup> President Biden strengthened those protections by barring lobbyists from joining agencies they had lobbied within the past two years.<sup>7</sup> Yet in his second term, President Trump has issued no ethics pledge at all.<sup>8</sup> Rather than breaking from the culture of influence-peddling he once railed against, President Trump has embraced it, abandoning even the pretense of cracking down on conflicts of interest.

The result is that the Trump administration has become a textbook example of Washington’s revolving door, with lobbyists, consultants, and political operatives cycling into powerful government roles and using those positions to advance the interests of the very industries that once paid them.

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<sup>3</sup> Letter from Senator Elizabeth Warren to Transition Co-Chairs Howard Lutnick & Linda McMahon, January 17, 2025, [https://www.warren.senate.gov/imo/media/doc/warren\\_letter\\_re\\_trump\\_transition\\_ethics.pdf](https://www.warren.senate.gov/imo/media/doc/warren_letter_re_trump_transition_ethics.pdf).

<sup>4</sup> E.g., Office of Government Ethics, Sean Duffy Ethics Agreement, January 13, 2025, [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/309D7AF0E49F7A7885258C130032FC36/\\$FILE/Duffy%20%20Sean%20%20finalEA.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/309D7AF0E49F7A7885258C130032FC36/$FILE/Duffy%20%20Sean%20%20finalEA.pdf); Office of Government Ethics, Pam Bondi Ethics Agreement, January 14, 2025, [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/3CDD529EC3045A9785258C84002C1259/\\$FILE/Bondi%20EA%20Certification%201%20of%201.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/3CDD529EC3045A9785258C84002C1259/$FILE/Bondi%20EA%20Certification%201%20of%201.pdf).

<sup>5</sup> 5 U.S.C. § 402.

<sup>6</sup> White House Archives, “Executive Order: Ethics Commitments by Executive Branch Appointees,” January 28, 2017, <https://trumpwhitehouse.archives.gov/presidential-actions/executive-order-ethics-commitments-executive-branch-appointees/>.

<sup>7</sup> Executive Office of the President, “Ethics Commitments by Executive Branch Personnel,” Federal Register, January 25, 2021, <https://www.federalregister.gov/documents/2021/01/25/2021-01762/ethics-commitments-by-executive-branch-personnel>.

<sup>8</sup> Congressional Research Service, “Ethics Pledges and Other Executive Branch Appointee Restrictions Since 1993: Historical Perspective, Current Practices, and Options for Change,” Jacob Straus, April 28, 2025, <https://www.congress.gov/crs-product/R44974>; Campaign Legal Center, “On Day One of His Presidency, Trump Ignored Yet Another Ethics Norm,” Kristin Roehrig, January 23, 2025, <https://campaignlegal.org/update/day-one-his-presidency-trump-ignored-yet-another-ethics-norm>; Citizens for Responsibility and Ethics in Washington, “CREW is tracking Trump’s unprecedented corruption (again),” Rebecca Jacobs, February 3, 2025, <https://www.citizensforethics.org/reports-investigations/crew-investigations/crew-is-tracking-trumps-unprecedented-corruption-again/>.

Meanwhile, lobbying firms with ties to the Administration are now thriving.<sup>9</sup> Ballard Partners, “which counts Attorney General Pam Bondi and White House chief of staff Susie Wiles among its alumni,” raked in more than \$88 million in fees in 2025 alone, representing a 350 percent increase in revenue from 2024.<sup>10</sup> BGR, former employer of Sean Duffy, current head of the Department of Transportation, raked in \$71.5 million in 2025, a 58 percent increase from lobbying revenues in 2024.<sup>11</sup> Some lobbying firms openly market their access to the Trump Administration by highlighting alumni now in top government roles<sup>12</sup> — capitalizing on their direct lines to senior officials.<sup>13</sup> Multiple officials from the second Trump Administration have already left office and joined lobbying firms, raising serious concerns about whether they could use their inside access to steer benefits to their new lobbying clients.<sup>14</sup> And “[f]irms with close ties to administration officials or the Trump family feature prominently on the list of lobbying firms that have disclosed the fastest-growing revenue this year.”<sup>15</sup>

Some notable former lobbyists currently serving in this Administration include:

- **Attorney General Pam Bondi**, a former Ballard Partners lobbyist, now runs the Department of Justice (DOJ). Many of her previous firm’s clients have business before DOJ,<sup>16</sup> and almost all of the clients that have paid Ballard to lobby DOJ in 2025, hired the firm *after* AG Bondi entered office. And in 2025, Ballard saw “the most lucrative quarter ever reported by a lobbying firm.”<sup>17</sup> Some of Ballard’s clients have already received

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<sup>9</sup> Politico, “Lobbying firms tied to Trump report wave of new clients,” Caitlin Oprysko, January 29, 2025, <https://www.politico.com/news/2025/01/29/lobbying-trump-k-street-ballard-00201263>.

<sup>10</sup> Politico, “Trump’s return supercharges lobbying revenues,” Caitlin Oprysko, January 25, 2026, <https://www.politico.com/news/2026/01/25/trump-lobbying-revenues-00744357>.

<sup>11</sup> *Id.*

<sup>12</sup> New York Times, “‘Trump Inc.’: Filings Show Staff Profited From Being in the President’s Orbit,” Kenneth P. Vogel, June 15, 2025, <https://www.nytimes.com/2025/06/15/us/politics/trump-inc-filings-show-staff-profited-from-being-in-the-presidents-orbit.html>.

<sup>13</sup> ABC News, “Trump-aligned lobbyists flourish as companies flock to try to gain administration’s favor,” Soo Rin Kim, April 23, 2025, <https://abcnews.go.com/US/trump-aligned-lobbyists-flourish-companies-flock-gain-administrations/story?id=121098657>; Guardian, “Lobbyists linked to Donald Trump paid millions by world’s poorest countries,” Mark Townsend, July 10, 2025, <https://www.theguardian.com/global-development/2025/jul/10/lobbyists-linked-donald-trump-poorest-countries-mineral-resources-trade-deals-for-us-aid-military-support>.

<sup>14</sup> *See, e.g.*, Politico, “Senior WH aide first to decamp for K Street,” Caitlin Oprysko, August 19, 2025, <https://www.politico.com/news/2025/08/19/morse-lobbying-trump-brownstein-00515319>; CBS News, “Longtime Trump insider May Davis Mailman departs White House,” Jennifer Jacobs, August 3, 2025, <https://www.cbsnews.com/news/may-davis-mailman-leaving-white-house/>; Axios, “Trump’s principal deputy press secretary heads to K Street,” Alex Thompson, August 20, 2025, <https://www.axios.com/2025/08/20/trump-principal-deputy-press-secretary-leaving>.

<sup>15</sup> Bloomberg, “A Gunmaker’s Lobbying Shows How Trump’s Tariffs Changed the Game,” Ted Mann, Shawn Donnan, Nazmul Ahasan, Michael Smith, and Jessica Brice, October 1, 2025, <https://www.bloomberg.com/news/features/2025-10-01/businesses-eager-to-beat-tariffs-turn-to-trump-connected-lobbyists>.

<sup>16</sup> Public Citizen, “D.C. Firm Ballard Partners Lobbying Department of Justice Run by Former Ballard Lobbyist Pam Bondi, New Filings Show,” July 24, 2025, <https://www.citizen.org/news/d-c-firm-ballard-partners-lobbying-department-of-justice-run-by-former-ballard-lobbyist-pam-bondi-new-filings-show/>; Office of Government Ethics, Pam Bondi Public Financial Disclosure Report (OGE Form 278e), January 3, 2025, <https://extapps2.oge.gov/201/Presiden.nsf/PAS%2BIndex/ABF60CD8EC97BBB585258C150032DCB2/%24FILE/Bondi%2C%20Pam%20%20final278.pdf>.

favorable action by the DOJ.<sup>18</sup> For example, DOJ dropped its antitrust challenge to the American Express GBT merger shortly after Ballard was hired to lobby on the matter.<sup>19</sup> Ballard Partners also works as a lobbyist for Netflix and Paramount at the same time that both seek to merge with Warner Bros Discovery — and AG Bondi’s DOJ will decide whether to approve that merger.<sup>20</sup>

- **Transportation Secretary Sean Duffy**, as a lobbyist with BGR Group, previously represented the Partnership for Fair and Open Skies, a coalition that included major U.S. airlines.<sup>21</sup> Since Secretary Duffy’s confirmation, BGR has expanded its DOT lobbying roster to 19 clients, up from 14 during the Biden Administration and just 6 in President Trump’s first term.<sup>22</sup> Airlines have since secured billions in federal funding and seen a rollback of Biden-era consumer protections that were costly for the airline industry.<sup>23</sup>
- **White House Chief of Staff Susie Wiles**, formerly a senior lobbyist with the firm Mercury Public Affairs, now helps run and control access to the Executive Office of the President.<sup>24</sup> Mercury reported lobbying the White House on behalf of 26 clients in 2025<sup>25</sup>,

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<sup>17</sup> AEI, “Swamp Undrained: Trump-Cozy Lobbying Firm Sets K Street Revenue Record,” Timothy P. Carney, August 8, 2025, <https://www.aei.org/op-eds/swamp-undrained-trump-cozy-lobbying-firm-sets-k-street-revenue-record/>.

<sup>18</sup> Public Citizen, “D.C. Firm Ballard Partners Lobbying Department of Justice Run by Former Ballard Lobbyist Pam Bondi, New Filings Show,” July 24, 2025, <https://www.citizen.org/news/d-c-firm-ballard-partners-lobbying-department-of-justice-run-by-former-ballard-lobbyist-pam-bondi-new-filings-show/>; Office of Government Ethics, Pam Bondi Public Financial Disclosure Report (OGE Form 278e), January 3, 2025, <https://extapps2.oge.gov/201/Presiden.nsf/PAS%2BIndex/ABF60CD8EC97BBB585258C150032DCB2/%24FILE/Bondi%2C%20Pam%20%20final278.pdf>.

<sup>19</sup> Politico, “Here’s what happens when big-time lobbyists become big-name Trump officials,” Caitlin Oprysko, September 21, 2025, <https://www.politico.com/news/2025/09/21/lobbying-connections-duffy-wiles-00574382>.

<sup>20</sup> Real Sludge, “Trump Cabinet Officials’ Former Clients Are Now Lobbying Their Offices,” David Moore, May 6, 2025, <https://readsludge.com/2025/05/06/trump-cabinet-officials-former-clients-are-now-lobbying-their-offices/>.

<sup>21</sup> Politico, “Here’s what happens when big-time lobbyists become big-name Trump officials,” Caitlin Oprysko, September 21, 2025, <https://www.politico.com/news/2025/09/21/lobbying-connections-duffy-wiles-00574382>; The Hill, “Why were lawmakers only lobbying softballs at Sean Duffy?,” William J. Mcgee, February 3, 2025, <https://thehill.com/opinion/congress-blog/5119601-sean-duffy-transportation-secretary-concerns/>.

<sup>22</sup> *Id.*

<sup>23</sup> Letter from Senator Elizabeth Warren to Department of Transportation Acting Inspector General Mitch Behm, December 17, 2025, [https://www.warren.senate.gov/imo/media/doc/letter\\_to\\_dot\\_ig\\_on\\_duffy\\_conflicts\\_of\\_interest.pdf](https://www.warren.senate.gov/imo/media/doc/letter_to_dot_ig_on_duffy_conflicts_of_interest.pdf); New York Times, “The Trump Administration Wants to Roll Back Airline Passenger Rights,” Christine Chung, September 11, 2025, <https://www.nytimes.com/2025/09/11/travel/airline-passenger-protections-trump-transportation-department.html>; CBS News, “Feds scrap proposal to offer cash to airline passengers for flight disruptions,” Megan Cerullo, September 5, 2025, <https://www.cbsnews.com/news/airlines-flight-disruption-transportation-department-cash-refund/>; MSN, “Airlines want to roll back these consumer protections – what passengers can do,” Jeremy Tanner, October 2, 2025, <https://www.msn.com/en-us/travel/news/airlines-want-to-roll-back-these-consumer-protections-what-passengers-can-do/ar-AA1NJRr>.

<sup>24</sup> Politico, “Here’s what happens when big-time lobbyists become big-name Trump officials,” Caitlin Oprysko, September 21, 2025, <https://www.politico.com/news/2025/09/21/lobbying-connections-duffy-wiles-00574382>; Public Citizen, “Meet Susie Wiles’ Controversial Corporate Lobbying Clients,” Jon Golinger, November 15, 2024, <https://www.citizen.org/article/meet-susie-wiles-controversial-corporate-lobbying-clients/>.

<sup>25</sup> *Id.*

more than during the entire Biden presidency — including on behalf of powerful mining<sup>26</sup> and pharmaceutical<sup>27</sup> interests.

- **Deputy Assistant Administrator of the Office of Chemical Safety and Pollution Prevention at the EPA, Kyle Kunkler**, had been lobbying the Environmental Protection Agency (EPA) about pesticide policy as a senior director of government affairs for the American Soybean Association; just months later, he began overseeing pesticide policy at the EPA.<sup>28</sup> He may have already shaped agency policy on matters on which he recently lobbied: in March 2025, Kunkler lobbied EPA officials on a controversial weedkiller known as dicamba.<sup>29</sup> By July 2025, weeks after Kunkler joined the EPA, the agency had proposed allowing the use of dicamba.<sup>30</sup>
- **Assistant Administrator for the Office of Chemical Safety and Pollution Prevention at the EPA, Douglas Troutman**, was the chief lobbyist for the American Cleaning Institute, representing companies that manufacture cleaning products, and reportedly sought to weaken protections against toxic chemicals.<sup>31</sup> Now, as a senior official at the

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<sup>26</sup> Reuters, “Congo eyes US minerals deal by end of June, FT reports,” May 25, 2025, <https://www.reuters.com/world/africa/congo-eyes-us-minerals-deal-by-end-june-ft-reports-2025-05-25/>; Office of Congresswoman Linda Sanchez, “Sanchez, colleagues call for transparency in Congo critical minerals agreement,” August 11, 2025, <http://lindasanchez.house.gov/media-center/press-releases/sanchez-colleagues-call-transparency-congo-critical-minerals-agreement>; Africa Intelligence, “Closed-door negotiations in Washington over mining deal,” August 8, 2025, <https://www.africaintelligence.com/central-africa/2025/08/28/closed-door-negotiations-in-washington-over-mining-deal.110515361-art>,” <https://www.africaintelligence.com/central-africa/2025/08/28/closed-door-negotiations-in-washington-over-mining-deal.110515361-art>; CNN, “Two countries signed a peace deal in Washington. On the ground, little has changed,” Sarah Dean and Larry Madowo, September 22, 2025, <https://www.cnn.com/2025/09/22/africa/dr-congo-rwanda-peace-deal-trump-fighting-intl-cmd>.

<sup>27</sup> Bloomberg, “Drug Middlemen Aim to Avoid New Rules With Voluntary Changes,” John Tozzi and Rachel Cohrs Zhang, September 24, 2025, <https://www.bloomberg.com/news/articles/2025-09-24/drug-middlemen-look-to-head-off-new-rules-with-voluntary-changes?embedded-checkout=true>; Politico, “Here’s what happens when big-time lobbyists become big-name Trump officials,” Caitlin Oprysko, September 21, 2025, <https://www.politico.com/news/2025/09/21/lobbying-connections-duffy-wiles-00574382?nid=0000014f-1646-d88f-a1cf-5f46b7bd0000&nname=playbook&nrid=00000163-f605-dda8-a1fb-f7e734930000>; United States Senate Lobbying Disclosure, “Lobbying Report: 1<sup>st</sup> Quarter,” April 16, 2025, <https://lda.senate.gov/filings/public/filing/2f7d664c-e297-48dc-b680-b6902f6bd12d/print/>; Politico, “Congolese state mining company hires Mercury,” Caitlin Oprysko, April 26, 2024, <https://www.politico.com/newsletters/politico-influence/2024/04/26/congolese-state-mining-company-hires-mercury-00154697>; Global Witness, “Regime cash machine,” July 21, 2017, <https://globalwitness.org/en/campaigns/oil-gas-and-mining/regime-cash-machine>.

<sup>28</sup> E&E News, “Farm industry lobbyist, MAHA critic to head EPA pesticides office,” Ellie Borst, June 27, 2025, <https://www.eenews.net/articles/farm-industry-lobbyist-maha-critic-to-head-epa-pesticides-office/>; United States Environmental Protection Agency, “About the Office of Chemical Safety and Pollution Prevention,” 2026, <https://www.epa.gov/aboutepa/about-office-chemical-safety-and-pollution-prevention>;

<sup>29</sup> Washington Post, “How Big Agriculture got its way in the latest MAHA report,” Amudalat Ajasa and Rachel Roubein, October 6, 2025, <https://www.washingtonpost.com/climate-environment/2025/10/05/maha-report-agriculture-lobby/>.

<sup>30</sup> New York Times, “From Industry to E.P.A.: Lobbyist Now Oversees Pesticide Rules,” Hiroko Tabuchi, October 21, 2025, <https://www.nytimes.com/2025/10/21/climate/from-industry-to-epa-lobbyist-now-oversees-pesticide-rules.html>; New York Times, “E.P.A. Proposes Allowing Use of Dicamba Weedkiller on Some Crops,” Claire Brown, July 23, 2025, <https://www.nytimes.com/2025/07/23/climate/dicamba-weed-killer-epa.html>.

<sup>31</sup> United States Senate Lobbying Disclosure Act Reports, “American Cleaning Institute Lobbying Report,” October 17, 2025, <https://lda.senate.gov/filings/public/filing/2b1eccdf-c51e-4506-bda2-a40d86d84edd/print/>; Profile on LinkedIn, Douglas Troutman, <https://www.linkedin.com/in/douglas-m-troutman>; The Guardian, “US Senate poised to approve industry lobbyist to lead chemical safety at EPA,” Tom Perkins, October 18, 2025, <https://www.theguardian.com/us-news/2025/oct/18/senate-epa-confirmation-douglas-troutman-lobbyist>.

EPA,<sup>32</sup> Troutman is responsible for overseeing some of those same chemical safety rules.<sup>33</sup>

- **Acting Director of the Bureau of Ocean Energy Management (BOEM) at the Department of the Interior, Matthew Giacona**, a former lobbyist for the offshore oil and gas drilling industry with the National Ocean Industries Association (NOIA), now controls leases for deep-sea oil drilling as Acting Director of BOEM.<sup>34</sup> Shortly after joining BOEM, Giacona reportedly facilitated a meeting between top Interior Department officials and representatives of Chevron—a member of NOIA—regarding the Department's draft biological opinion on oil and gas operations in the Gulf of Mexico.<sup>35</sup>

Many other high-level Administration officials were not registered lobbyists but advanced industry interests in other ways — including through consulting and behind-the-scenes “shadow lobbying” — and are now positioned to assist their former clients from inside government. For example:

- **White House “Border Czar” Tom Homan**, previously consulted with companies seeking immigration contracts and reportedly received a bag containing \$50,000 in cash in exchange for promises to help companies secure federal contracts.<sup>36</sup> Since entering the Trump Administration, Homan has participated in meetings about immigration-related contracts that could be profitable for his former clients.<sup>37</sup>

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<sup>32</sup> The Guardian, “US Senate poised to approve industry lobbyist to lead chemical safety at EPA,” Tom Perkins, October 18, 2025, <https://www.theguardian.com/us-news/2025/oct/18/senate-epa-confirmation-douglas-troutman-lobbyist>; United States Environmental Protection Agency, “Senate Confirms Douglas Troutman as Assistant Administrator for EPA’s Office of Chemical Safety and Pollution Prevention,” press release, December 18, 2025, <https://www.epa.gov/newsreleases/senate-confirms-douglas-troutman-assistant-administrator-epas-office-chemical-safety>.

<sup>33</sup> The Guardian, “US Senate poised to approve industry lobbyist to lead chemical safety at EPA,” Tom Perkins, October 18, 2025, <https://www.theguardian.com/us-news/2025/oct/18/senate-epa-confirmation-douglas-troutman-lobbyist>; United States Environmental Protection Agency, “About the Office of Chemical Safety and Pollution Prevention,” 2026, <https://www.epa.gov/aboutepa/about-office-chemical-safety-and-pollution-prevention>.

<sup>34</sup> United States Senate Lobbying Disclosure Act Reports, “Matthew Giacona,” [https://lda.senate.gov/filings/public/filing/search/?registrant=&registrant\\_country=&registrant\\_ppb\\_country=&client=&client\\_state=&client\\_country=&client\\_ppb\\_country=&house\\_id=&lobbyist=giacona%2C+mat&lobbyist\\_covered\\_position=&lobbyist\\_conviction\\_disclosure=&lobbyist\\_conviction\\_date\\_range\\_from=&lobbyist\\_conviction\\_date\\_range\\_to=&report\\_period=&report\\_year=&report\\_dt\\_posted\\_from=&report\\_dt\\_posted\\_to=&report\\_amount\\_reported\\_min=&report\\_amount\\_reported\\_max=&report\\_filing\\_uuid=&report\\_house\\_doc\\_id=&report\\_issue\\_area\\_description=&affiliated\\_organization=&affiliated\\_organization\\_country=&foreign\\_entity=&foreign\\_entity\\_country=&foreign\\_entity\\_ppb\\_country=&foreign\\_entity\\_ownership\\_percentage\\_min=&foreign\\_entity\\_ownership\\_percentage\\_max=&search=search#js\\_searchFormTitle](https://lda.senate.gov/filings/public/filing/search/?registrant=&registrant_country=&registrant_ppb_country=&client=&client_state=&client_country=&client_ppb_country=&house_id=&lobbyist=giacona%2C+mat&lobbyist_covered_position=&lobbyist_conviction_disclosure=&lobbyist_conviction_date_range_from=&lobbyist_conviction_date_range_to=&report_period=&report_year=&report_dt_posted_from=&report_dt_posted_to=&report_amount_reported_min=&report_amount_reported_max=&report_filing_uuid=&report_house_doc_id=&report_issue_area_description=&affiliated_organization=&affiliated_organization_country=&foreign_entity=&foreign_entity_country=&foreign_entity_ppb_country=&foreign_entity_ownership_percentage_min=&foreign_entity_ownership_percentage_max=&search=search#js_searchFormTitle); Bureau of Ocean Energy Management, “BOEM Leadership: Matthew Giacona,” <https://www.boem.gov/about-boem/boem-leadership/matthew-giacona>.

<sup>35</sup> Public Domain, “He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them,” Jimmy Tobias and Hana Beach, June 27, 2025, <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>; Letter from Representative Jared Huffman, et al., to Caryl Brzymialkiewicz, Acting Inspector General at the US Department of the Interior, October 8, 2025, [https://democrats-naturalresources.house.gov/imo/media/doc/rm\\_letter\\_to\\_doi\\_oig\\_re\\_giacona\\_ethics\\_violations.pdf](https://democrats-naturalresources.house.gov/imo/media/doc/rm_letter_to_doi_oig_re_giacona_ethics_violations.pdf).

<sup>36</sup> MSNBC, “Tom Homan was investigated for accepting \$50,000 from undercover FBI agents. Trump's DOJ shut it down,” Carol Leonnig and Ken Dilanian, September 20, 2025, <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

- **DHS advisor Corey Lewandowski**, a former shadow lobbyist, now reportedly holds “veto power” over large DHS contracts.<sup>38</sup> Despite this apparent conflict of interest, Lewandowski has yet to reveal whether any of his former or current clients may be seeking lucrative DHS contracts that he has the power to influence.<sup>39</sup>
- **Nancy Beck** worked for the chemical industry through the trade group American Chemistry Council and now leads chemical safety policy as Principal Deputy Assistant Administrator of the Office of Chemical Safety and Pollution Prevention at the Environmental Protection Agency (EPA).<sup>40</sup> In 2025, the EPA proposed loosening rules for new chemicals moving through the EPA’s review process,<sup>41</sup> a boon for chemical companies like Beck’s former clients.

Under federal law, officials should recuse from specific-party matters involving their former client or employer for at least one year if a reasonable observer would question the official’s impartiality.<sup>42</sup> And most top officials sign ethics agreements that bind them to recuse from such matters.<sup>43</sup> However, officials can seek recusal waivers so that they can work on matters involving these former clients, and after that first year, officials are free to work on their former clients’ matters.<sup>44</sup> But even if these activities are legal, officials’ involvement in such matters may raise

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<sup>37</sup> *Id.*; Rolling Stone, “Incoming Trump Border Czar’s Firm Brags About Helping Companies Get Contracts,” Naomi LaChance, December 30, 2024, <https://www.rollingstone.com/politics/politics-features/trump-border-tom-homan-firm-federal-contracts-1235219657/>.

<sup>38</sup> Wall Street Journal, “How Corey Lewandowski Became Kristi Noem’s Gatekeeper at DHS,” Aug. 7, 2025) [www.wsj.com/politics/policy/how-corey-lewandowski-became-kristi-noems-gatekeeper-at-dhs-6c08d996](https://www.wsj.com/politics/policy/how-corey-lewandowski-became-kristi-noems-gatekeeper-at-dhs-6c08d996); CNN, “How Corey Lewandowski’s Power at the Department of Homeland Security Keeps Growing,” August 5, 2025, [www.cnn.com/2025/08/05/politics/corey-lewandowski-growing-power-dhs](https://www.cnn.com/2025/08/05/politics/corey-lewandowski-growing-power-dhs); Axios, “DHS Probe Lewandowski’s Work Amid Day Limit Concerns, August 14, 2025, [www.axios.com/2025/08/14/white-house-dhs-lewandowski-noem](https://www.axios.com/2025/08/14/white-house-dhs-lewandowski-noem).

<sup>39</sup> Politico, “Lewandowski’s veto power over DHS contracts frustrates admin officials: ‘Corey is part of the problem,’” Myah Ward and Zack Colman, August 27, 2025, <https://www.politico.com/news/2025/08/27/tk-00527043>; Axios, “Exclusive: Oversight Committee Dem expands inquiry into Corey Lewandowski,” Brittany Gibson, September 5, 2025, <https://www.axios.com/2025/09/05/corey-lewandowski-trump-aide-probe-expands>.

<sup>40</sup> E&E News, “Nancy Beck gets decision-making power in EPA chemicals office,” Ellie Borst, March 6, 2025, <https://www.eenews.net/articles/nancy-beck-gets-decision-making-power-in-epa-chemicals-office/>; New York Times, “Two Industry Executives Join E.P.A. to Help Oversee Chemical Rules,” Hiroko Tabuchi, January 22, 2025, <https://www.nytimes.com/2025/01/22/climate/epa-chemical-industry-beck-dekleva.html>; Environmental Protection Agency, About the Office of Chemical Safety and Pollution Prevention, October 21, 2025, <https://www.epa.gov/aboutepa/about-office-chemical-safety-and-pollution-prevention>.

<sup>41</sup> Chemical and Engineering News, “EPA aims to loosen chemical regulations via controversial standards,” Leigh Krietsch Boerner, September 25, 2025, <https://cen.acs.org/policy/chemical-regulation/EPA-aims-to-loosen-chemical-regulations-via-controversial-standards-/103/web/2025/09>.

<sup>42</sup> 5 CFR § 2635.502(b)(1)(iv).

<sup>43</sup> Federal Register, Ethics Commitments by Executive Branch Personnel, January 25, 2021, <https://www.federalregister.gov/documents/2021/01/25/2021-01762/ethics-commitments-by-executive-branch-personnel>; Office of Government Ethics, Ethics Agreements: Where Ethics Obligations Become Action, July 24, 2019, <https://www.oge.gov/web/oge.nsf/Resources/Ethics+Agreements:+Where+Ethics+Obligations+Become+Action>.

<sup>44</sup> Office of Government Ethics, Memorandum from OGE Acting Director Shelley K. Finlayson to Designated Agency Ethics Officials, June 10, 2024, [https://www.oge.gov/web/oge.nsf/News+Releases/63CD1B1A3F4A56E785258B38004A7D7D/\\$FILE/LA-24-07%20-%20Understanding%20the%20Recusal%20Obligations%20of%20Employees%20Affiliated%20with%20State%20and%20Local%20Government%20Entities.pdf](https://www.oge.gov/web/oge.nsf/News+Releases/63CD1B1A3F4A56E785258B38004A7D7D/$FILE/LA-24-07%20-%20Understanding%20the%20Recusal%20Obligations%20of%20Employees%20Affiliated%20with%20State%20and%20Local%20Government%20Entities.pdf).

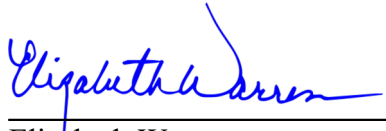
ongoing questions about bias and the propriety of actions taken by agencies under their watch — key questions for you to address in your evaluation.

We seek to understand whether former lobbyists, shadow lobbyists, or consultants in the Trump administration have used their government roles to assist their former clients. Furthermore, we seek information about the impact of these activities on the Trump Administration's policymaking. Therefore, in order to fulfill our legislative responsibilities regarding the operations of your agency and of government ethics and anti-corruption laws, we respectfully request that your office conduct an evaluation and answer the following questions:

1. Have any senior officials within your agency formally or informally participated in specific-party matters involving their former clients or employers?
  - a. If so, what was the nature of this participation, and the outcome of the matter?
2. Have any senior officials within your agency formally or informally influenced specific-party matters involving their former clients or employers?
  - a. If so, what was the nature of this influence, and the outcome of the matter?
3. Have any senior officials within your agency participated in particular matters of general applicability that directly impact the interests of their former clients or employers?
  - a. If so, what was the nature of this participation, and the outcome of the matter?
4. Have any senior officials within your agency received a waiver under 18 U.S.C. 208(b) (1) to work on former clients' or employers' matters?
5. Have any ethics investigations been opened into officials within your agency since January 20, 2025? If so, how many?
6. Have any former clients or employers of senior officials within your agency received favorable treatment by that agency during the Trump Administration?
7. To what extent has the participation of senior officials in any matters affecting their former clients or employers affected the credibility and integrity of the decision-making process at your agency?
8. How, if at all, does your agency plan to monitor its former officials' compliance with 18 U.S.C. 207 as they leave office?

Thank you for your attention to this matter.

Sincerely,



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Elizabeth Warren  
United States Senator



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Patrick Ryan  
Member of Congress



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Andy Kim  
United States Senator



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Deborah K. Ross  
Member of Congress