United States Senate

WASHINGTON, DC 20510

November 17, 2025

David Warrington
White House Counsel
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Eric Ueland
Acting Director
U.S. Office of Government Ethics
250 E Street, SW, Suite 750
Washington, DC 20024

Scott Gast
Designated Agency Ethics Official
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. Warrington, Acting Director Ueland, and Mr. Gast:

We have serious concerns about Steve Witkoff's financial conflicts of interest, and those concerns are exacerbated by the fact that Mr. Witkoff's financial disclosure form appears to be unreliable. To address our concerns about this matter, we request that the Office of Government Ethics (OGE), the White House Counsel's Office, and the White House's Designated Agency Ethics Official (DAEO) provide answers regarding Mr. Witkoff's financial disclosure form. As U.S. Special Envoy to the Middle East, Mr. Witkoff was a chief architect of a deal that appears to have aided a foreign power's effort to acquire U.S. technology with serious economic and national security implications — and he potentially did so in exchange for his personal financial benefit.[1] The following events have been reported in multiple outlets regarding Mr. Witkoff:[2]

- In 2024, Mr. Witkoff partnered with the Trump family to launch a cryptocurrency company, World Liberty Financial (WLF).

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[1] Letter to U.S. Department of Commerce Office of Inspector General, U.S. Department of State Office of Inspector General, and the U.S. Office of Government Ethics, September 23, 2025, https://www.banking.senate.gov/imo/media/doc/warren_slotkin_letter_requesting_oig_investigation_into_uae_chips_corruption.pdf; New York Times, "Anatomy of Two Giant Deals: The U.A.E. Got Chips. The Trump Team Got Crypto Riches.," Eric Lipton, David Yaffe-Bellany, Bradley Hope, Tripp Mickle, and Paul Mozur, September 15, 2025, https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty.html/.

[2] New York Times, "Anatomy of Two Giant Deals: The U.A.E. Got Chips. The Trump Team Got Crypto Riches.," Eric Lipton, David Yaffe-Bellany, Bradley Hope, Tripp Mickle, and Paul Mozur, September 15, 2025, https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty.html; The American Presidency Project, "Statement by President-elect Donald J. Trump Announcing the Appointment of Steven C. Witkoff as Special Envoy to the Middle East," November 12, 2024, https://www.presidency.ucsb.edu/documents/statement-president-elect-donald-j-trump-announcing-the-appointment-steven-c-witkoff; CNBC, "New details of Trump family crypto project released, including who can buy in," MacKenzie Sigalos and Christina Wilkie, September 16, 2024, https://www.cnbc.com/2024/09/16/trump-crypto-world-liberty-financial.html.

- Later in 2024, he was appointed U.S. Special Envoy to the Middle East.

- This year, as Middle East Special Envoy, Mr. Witkoff was briefed on plans for the United States to export the world's most advanced A.I. chips to the United Arab Emirates. That plan had previously stalled due to national security concerns, but Mr. Witkoff reportedly advocated for exporting the chips.

- Soon thereafter, an export deal was approved.

- Around the same time, a UAE government-backed firm "effectively handed World Liberty a $2 billion bank deposit" by investing $2 billion in WLF's stablecoin.[3]

To observers, this fact pattern suggested that the two deals may have been "intertwined": support for the valuable chips export deal in exchange for a lucrative investment.[4]

Despite the seriousness of his conflicts of interest, Mr. Witkoff's financial disclosure form appears to have inaccurate or incomplete information. These forms are not simply administrative paperwork. They are one of the few tools the public has for understanding the nature of public officials' conflicts of interest. Agency ethics officials review the disclosure forms to ensure compliance and to guard against conflicts that could compromise federal decision-making.[5] Senior officials who are required to complete public financial disclosure forms can face legal repercussions for knowingly and willfully providing false information.[6]

Mr. Witkoff's financial disclosure form raises several concerns. First, no agency ethics official signed the form, nor did anyone from the OGE — even though the 60-day deadline for an ethics official to review his form passed in October 2025.[7] Thus, it appears that no independent ethics reviewer has confirmed whether Mr. Witkoff is "in compliance with applicable laws and regulations."[8] Mr. Witkoff's financial disclosure form (278e) appears to be one of almost two dozen financial disclosure reports in the White House's database that are not signed by an ethics official, raising broader questions about how the White House is handling the financial disclosure process and identifying conflicts of interest.[9]

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[3] New York Times, "Anatomy of Two Giant Deals: The U.A.E. Got Chips. The Trump Team Got Crypto Riches.," Eric Lipton, David Yaffe-Bellany, Bradley Hope, Tripp Mickle, and Paul Mozur, September 15, 2025, https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty.html.

[4] New York Times, "5 Takeaways From The Times's Investigation Into 2 Giant Deals Involving Trump," Eric Lipton, David Yaffe-Bellany, Bradley Hope, Tripp Mickle, and Paul Mozur, September 15, 2025, https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty-takeaways.html; Letter to U.S. Department of Commerce Office of Inspector General, U.S. Department of State Office of Inspector General, and the U.S. Office of Government Ethics, September 23, 2025, https://www.banking.senate.gov/imo/media/doc/warren_slotkin_letter_requesting_oig_investigation_into_uae_chips_corruption.pdf.

[5] 5 CFR § 2638.104(c)(8)(v).

[6] 5 U.S.C. § 13103 - § 13106; 18 U.S.C. § 1001.

[7] Office of Government Ethics, Steve Witkoff Public Financial Disclosure, August 2025, pp. 1-2, https://www.whitehouse.gov/wp-content/uploads/2025/09/Witkoff-Steven.pdf; 5 U.S.C. § 13108(a)(1).

[8] *Id.*

[9] White House, Public Disclosures, https://www.whitehouse.gov/disclosures/.

Second, the form lists June 30, 2025 as the date of his appointment as the White House's Assistant to the President and Special Envoy for Peace Missions and states that he held no other federal position during the 12 months before the form was filed on August 13, 2025.[10] However, Mr. Witkoff was named Middle East Special Envoy on November 12, 2024, and he appears to have begun working in that role in January 2025.[11] For example, in January and February 2025, he represented the Trump Administration in high-level meetings in Saudi Arabia, announced official travel to Gaza under the President's directive, and participated in diplomatic negotiations concerning Israel and Gaza.[12] In other words, Mr. Witkoff appears to have worked for months before disclosing his financial interests to the public, contrary to what his disclosure form suggests.

Third, the disclosure form does not make clear how much Mr. Witkoff currently owns in his most concerning investment: the WLF crypto company. WLF is simply listed as one of many investments within Witkoff Holdings LLC, a fund worth over $50 million.[13] In May, WLF asserted that Mr. Witkoff was "fully divesting" and, months later, the White House said that he was "still in the process of divesting."[14] It is unclear whether Mr. Witkoff had divested even a portion of his WLF holdings as of the date of his filing in August 2025.[15] The form states that, as of August 2025, Mr. Witkoff had divested a $120 million interest in one of his holdings within The Witkoff Group LLC but does not specify which investment.[16]

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[10] Office of Government Ethics, Steve Witkoff Public Financial Disclosure, August 2025, p. 1, https://www.whitehouse.gov/wp-content/uploads/2025/09/Witkoff-Steven.pdf; Office of Government Ethics, "OGE Form 278e: Cover Page," https://www.oge.gov/web/278eGuide.nsf/Cover_Page.

[11] The American Presidency Project, "Statement by President-elect Donald J. Trump Announcing the Appointment of Steven C. Witkoff as Special Envoy to the Middle East," November 12, 2024, https://www.presidency.ucsb.edu/documents/statement-president-elect-donald-j-trump-announcing-the-appointment-steven-c-witkoff; U.S. Department of State, "Secretary of State Marco Rubio, National Security Advisor Mike Waltz, and Special Envoy to the Middle East Steve Witkoff with Jennifer Hansler of CNN and Matthew Lee of the Associated Press," February 18, 2025, https://www.state.gov/secretary-of-state-marco-rubio-national-security-advisor-mike-waltz-and-special-envoy-to-the-middle-east-steve-witkoff-with-jennifer-hansler-of-cnn-and-matthew-lee-of-the-associated-press; The White House, "Steve Witkoff Sworn In at the Oval Office, May 6, 2025," May 6, 2025, https://www.whitehouse.gov/videos/steve-witkoff-sworn-in-at-the-oval-office-may-6-2025/; Fox News Business, "Who is Donald Trump's Middle East envoy Steve Witkoff?," Breck Dumas, January 15, 2025, https://www.foxbusiness.com/politics/who-donald-trumps-middle-east-envoy-steve-witkoff.

[12] Al Jazeera, "Trump's Middle East envoy will enter Gaza as part of 'inspection team,'" January 22, 2025, https://www.aljazeera.com/news/2025/1/22/trumps-middle-east-envoy-will-enter-gaza-as-part-of-inspection-team; CBS News, "U.S., Russia agree to 'begin working on a path' to end Ukraine war, in meeting in Saudi Arabia with no Ukrainians," February 18, 2025, https://www.cbsnews.com/news/us-russia-meeting-improving-relations-ukraine-war/; Axios, "Scoop: White House envoy met senior Palestinian official in Saudi Arabia," Barak Ravid, January 28, 2025, https://www.axios.com/2025/01/28/trump-palestinians-meeting-abbas-witkoff; Reuters, "US envoy Witkoff may travel to Middle East Sunday, Axios reports," February 25, 2025, https://www.reuters.com/world/us/us-envoy-witkoff-may-travel-middle-east-sunday-axios-reports-2025-02-26/.

[13] Office of Government Ethics, Steve Witkoff Public Financial Disclosure, August 2025, pp. 21-23, https://www.whitehouse.gov/wp-content/uploads/2025/09/Witkoff-Steven.pdf.

[14] New York Times, "Anatomy of Two Giant Deals: The U.A.E. Got Chips. The Trump Team Got Crypto Riches.," Eric Lipton, David Yaffe-Bellany, Bradley Hope, Tripp Mickle, and Paul Mozur, September 15, 2025, https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty.html.

[15] Bloomberg, "US Special Envoy Is Still Holding Trump-Linked Crypto Assets," Natalia Drozdiak and Bill Allison, September 17, 2025, https://www.bloomberg.com/news/articles/2025-09-17/steve-witkoff-is-still-holding-trump-linked-crypto-assets.

[16] Office of Government Ethics, Steve Witkoff Public Financial Disclosure, August 2025, p. 8, https://www.whitehouse.gov/wp-content/uploads/2025/09/Witkoff-Steven.pdf.

These issues are not mere technicalities. They obstruct the public's ability to understand the full scope of Mr. Witkoff's apparent conflicts of interest, and the extent to which they are ongoing. Given the sensitive nature of Mr. Witkoff's role and the scale of his conflicts, and in order to assist us in fulfilling our legislative responsibilities with regard to government ethics and the nation's foreign policy, we ask that OGE, the White House DAEO, and the White House Counsel's Office answer the following questions by December 1, 2025:

1. Is all of the information provided on Mr. Witkoff's public disclosure form accurate and complete as to all reportable financial interests and outside positions?

2. Why has Mr. Witkoff's financial disclosure form not yet been signed by an ethics official, more than 60 days after the date of filing?

    a. Relatedly, please explain why the other 278e forms in the White House database that lack an ethics official's signature have not been signed by an ethics official. Are each of those forms still undergoing an ethics official's review?

    b. Please explain how the White House is managing conflicts of interest without having completed reviews of the financial disclosures of numerous staff members.

3. On what date did Mr. Witkoff begin work as Middle East Special Envoy? On what date did Mr. Witkoff begin work as Assistant to the President and Special Envoy for Peace Missions?

    a. Why does the disclosure state that Mr. Witkoff held no other federal government positions during the preceding 12 months before filing the form?

4. Is Mr. Witkoff currently invested in WLF?

    a. If so, what is the value of Mr. Witkoff's current holdings in WLF as of the date of this letter?

    b. When did Mr. Witkoff first learn that a UAE government-backed firm was investing $2 billion in WLF's stablecoin? When did he first learn that a UAE government-backed firm was *interested* in investing in WLF's stablecoin?

    c. Provide all names of all UAE government officials, board members of the government-backed firm, and officers and employees of the government-backed firm with whom Mr. Witkoff discussed WLF's stablecoin since November 12, 2024, and the dates on which the discussions occurred.

    d. Provide all dates on which Mr. Witkoff discussed WLF's stablecoin with any director, officer, or employee of either WLF or its parent company since January 20, 2025, and provide the name of each such director, officer, or employee.

5. Have OGE or any White House ethics officials fully reviewed Mr. Witkoff's financial holdings?

a. If so, have any ethics officials determined whether Mr. Witkoff should divest any holdings to avoid conflicts of interest in his current work? If so, please explain the determination.

b. What recusal obligations does Mr. Witkoff have in place to manage his conflicts of interest? Are these recusal obligations described in writing?

c. Has any federal official been designated to implement a screening arrangement to keep Mr. Witkoff from participating in particular matters in which he has a financial interest?

6. Has Mr. Witkoff received any ethics waivers with regard to his work as either Assistant to the President or as Special Envoy? If so, who issued the waiver?

7. Provide a legal analysis explaining whether the UAE government-backed firm's investment in WLF was part of the same particular matter as the agreement giving the Emiratis access to A.I. chips.

    a. If your analysis concludes that these matters were parts of the same "particular matter," explain your basis for concluding that Mr. Witkoff either did or did not comply with the primary criminal conflict-of-interest law, 18 U.S.C. § 208, when he participated in the agreement as to the chips.

    b. If your analysis concludes that these matters are not parts of the same "particular matter," explain what factual inquiry you conducted to ascertain (i) whether the investment decision of the UAE government-backed firm was in any way influenced by the agreement giving the UAE access to the chips and (ii) whether Mr. Witkoff was aware of the firm's interest in investing in WLF.

Thank you for your attention to this important matter.

Sincerely,

Elizabeth Warren
United States Senator

Christopher S. Murphy
United States Senator