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November 16, 2026

The Honorable Hung Cao
Acting Secretary of the Navy
U.S. Department of Defense
1000 Navy Pentagon
Washington, D.C. 20350

Dear Acting Secretary Cao:

Congratulations on your nomination to serve as Secretary of the Navy. If confirmed, you will be responsible for recruiting, training, and leading America's sailors and Marines and supplying, organizing, and managing America's Navy and Marine Corps, amid rising new technological threats and an ongoing, unauthorized war with Iran.[1] Leading and protecting America's service members is a sacred responsibility. In order to be effective, you will need the trust of the American people and the service members you lead. That means demonstrating that you are responsible to them and to the nation's broad national security needs, rather than special interests and favor-seekers. Unfortunately, under President Trump's leadership, the Pentagon's ethics record has been abysmal.[2] Given your previous position as a senior executive at CACI International Inc. (CACI) – a major defense contractor that receives hundreds of millions in Navy contracts per year – I am concerned that, if confirmed, you could use your position of power to deepen CACI's relationship with the Department of Defense (DoD) and position yourself to make a trip through the revolving door to return to the company after the end of your tenure.[3]

I initially raised my concerns last year, during your nomination process for Under Secretary of the Navy, but you declined several of my requests for further ethics commitments. First, you did not

[1] 10 U.S.C. 8013; Reuters, "AI could pose 'existential risk' to humanity, UN rights chief warns," Emma Farge, September 7, 2026, https://www.reuters.com/technology/ai-could-pose-existential-risk-humanity-un-rights-chief-warns-2026-09-07/; Bloomberg, "Iran Blockade Costs Are Draining America's Global Military Power," Gerry Doyle, Becca Wasser, Jen Judson, et al., September 15, 2026, https://www.bloomberg.com/graphics/2026-us-iran-war-blockade/; BBC, "Iran targets US military base in Bahrain with drone attack," Ella Kipling, November 15, 2026, 2026, https://www.bbc.com/news/articles/cqn4e2py48kwo.

[2] *See, e.g.,* Letter from U.S. Senators Elizabeth Warren, Tammy Duckworth, Richard Blumenthal, et al. to Inspector General of Defense Platte Moring, August 4, 2026, https://www.warren.senate.gov/wp-content/uploads/2026/08/2026.08.04-Letter-to-DoD-IG-re-Corruption-in-Pentagon-Awards-Process-1.pdf; Letter from U.S. Senators Elizabeth Warren, Richard Blumenthal, Mazie K. Hirono, et al. to White House Chief of Staff Susan Wiles, June 2, 2026, https://www.warren.senate.gov/wp-content/uploads/media/doc/warren_lawmakers_letter_to_white_house_re_white_house_intervention_in_trump_jrpentagoncontracts.pdf; ProPublica, "The Pentagon Gave $350 Million in Contracts to a Firm Closely Tied to a Senior Defense Department Official," Aaron C. David and Robert Faturechi, October 9, 2026, https://www.propublica.org/article/george-kollitides-pentagon-contracts-alvarez-marsal.

[3] Breaking Defense, "White House sends Cao's SECNAV nomination to Senate," Diana Stancy, September 14, 2026, https://breakingdefense.com/2026/09/white-house-sends-caos-secnav-nomination-to-senate/; USASpending.gov, "CACI International, Inc.," https://www.usaspending.gov/recipient/5eb76328-ceeb-571b-5efe-569794c9c9b8-P/2026.

agree to extend the recusal period for your former employer to four years.[4] You also declined to specifically commit not to seek any employment with, or compensation from, defense contractors or companies that you regulate or otherwise interact with while in government – including through serving on a board, as a consultant, or as a lobbyist – for four years after leaving DoD.[5] Lastly, you declined to specifically commit not to engage in lobbying activities (including unregistered "shadow lobbying" under the guise of consulting or advising) focused on DoD or any of its components for four years after leaving DoD.[6] I write to reiterate these asks.

First, I continue to have concerns about your relationship with your previous employer, CACI International Inc. You reportedly joined CACI in 2021 as a solutions architect and were still working at the firm in 2025 as the vice president and client executive for Navy and Marine Corps, meaning you were directly responsible for overseeing the company's programs with the agency you now run.[7] CACI is a major defense contractor, which counts among its many subsidiaries CACI Inc. – Federal, CACI Inc. – Commercial, and CACI Technologies LLC, that will continue to have ongoing business with the Pentagon.[8] For example, in FY 2026, during your tenure as Under Secretary of the Navy and Acting Secretary of the Navy, DoD obligated $2.6 billion in contracts to CACI, including nearly $483 million in contracts from the U.S. Navy.[9] As Under Secretary and then Acting Secretary of the Navy, you directly oversaw an agency that was signing hundreds of millions in contracts with your former firm.[10]

Your commitments have allowed for the possibility that you will make decisions in matters directly affecting your former employer, CACI, in the coming years. Pursuant to Section 1127 of the National Defense Authorization Act for Fiscal Year 2022, you agreed that you would "not knowingly participate personally and substantially in any particular matter involving specific parties" in which you know CACI "is a party or represents a party" for a period of two years after your resignation from CACI.[11] Your OGE 278e form indicates that you resigned from CACI in

[4] Response from Under Secretary of the Navy Nominee Hung Cao to Questions for the Record from U.S. Senator Elizabeth Warren, July 8, 2025, [On file with the Office of U.S. Senator Elizabeth Warren]; Letter from Secretary of the Navy Nominee Hung Cao to Danica Irvine, May 9, 2025, https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/F2F6EF2AEF0FED5D85258C8A002C896C/$FILE/Cao%2C%20Hung%20%20finalEA.pdf.

[5] Response from Under Secretary of the Navy Nominee Hung Cao to Questions for the Record from U.S. Senator Elizabeth Warren, July 8, 2025, [On file with the Office of U.S. Senator Elizabeth Warren].

[6] *Id.*

[7] Executive Biz, "Trump Appoints CACI Exec Hung Cao as Navy Under Secretary," Arthur McMiler, February 28, 2025, https://www.executivebiz.com/articles/hung-cao-us-navy-undersecretary.

[8] CACI International Inc., Annual Report Under Section 13 or 15(d) of the Securities Exchange Act of 1934 (Form 10-K), 2001, https://www.sec.gov/Archives/edgar/data/16058/000001605801500013/r10k901.htm; USASpending.gov, "CACI International, Inc.," https://www.usaspending.gov/recipient/5eb76328-ceeb-571b-5efe-569794c9c9b8-P/2026.

[9] USASpending.gov, "CACI International, Inc.," https://www.usaspending.gov/recipient/5eb76328-ceeb-571b-5efe-569794c9c9b8-P/2026; Inside Defense, "Hung Cao officially nominated for Navy secretary post," Nick Wilson, September 1, 2026, https://insidedefense.com/insider/hung-cao-officially-nominated-navy-secretary-post%C2%A0.

[10] *Id.*

[11] Letter from Secretary of the Navy Nominee Hung Cao to Danica Irvine, September 23, 2026, https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/C90D2F4692E1E7B785258E7F002DDA21/$FILE/Cao%2C%20Hung%20%20finalEA.pdf.

October 2025,[12] meaning that you may participate in these matters beginning in October of next year.[13] If you were to participate in a decision about a CACI contract, your prior employment relationship with the company would lead the public to reasonably question whether you were motivated to protect the company's interests rather than the public interest. To mitigate such conflicts, several former DoD officials have voluntarily agreed to lengthen their recusal period. In 2019, Secretary of Defense nominee and former Boeing employee Patrick Shanahan agreed to recuse himself from participating in matters in which Boeing was a party for the entire duration of his service.[14] Meanwhile, former Secretary of Defense Lloyd Austin and former Secretary of the Air Force Frank Kendall voluntarily agreed to recuse themselves from their former employers' specific-party matters for four years.[15] You should do the same.

I also urge you to establish a screening process to oversee this recusal process. During the first Trump administration, Defense Deputy Secretary Patrick Shanahan agreed to set up a screening process to help mitigate conflict-of-interest risks, and the Department of Defense Inspector General found "[t]hat process was adhered to and worked well."[16] You should likewise set up a process for a third-party staff member to screen all matters to determine whether they involve CACI so that you are not sowing doubt into the minds of service members and the American people into whether you are making decisions to steer contracts to your former employer, rather than on the basis of taxpayers costs and national security.

In addition, I reiterate my ask that, if you are confirmed, you commit to not seek employment, board membership, or any other form of compensation from any company that the Navy contracts or you otherwise interact with while in government, for at least four years after leaving office. If, for example, you were to leave DoD and immediately join a defense tech company that contracts with the Navy, 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

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[12] Hung Cao, Public Financial Disclosure Report (OGE Form 278e), September 10, 2026, https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/DC68D18B037ABF4185258E7F002D9A23/$FILE/Cao%2C%20Hung%20%20final278.pdf.

[13] Letter from Secretary of the Navy Nominee Hung Cao to DoD Alternate Designated Agency Ethics Official Danica Irvine, September 23, 2026, https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/C90D2F4692E1E7B785258E7F002DDA21/$FILE/Cao%2C%20Hung%20%20finalEA.pdf.

[14] Politico, "New Pentagon chief under scrutiny over perceived Boeing bias," Eliana Johnson and David Brown, January 9, 2019, https://www.politico.com/story/2019/01/09/defense-patrick-shanahan-boeing-pentagon-1064203.

[15] 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.

[16] U.S. Department of Defense, Office of the Secretary of Defense, "Updated Screening Arrangement," memorandum, January 7, 2019, https://www.esd.whs.mil/Portals/54/Documents/FOID/Proactive_disclosures/Mr_Shanahan_Screening_Arrangement_Update%20_(01.08.19).pdf?ver=2019-03-22-120845-537; U.S. Department of Defense Inspector General, "Report of Investigation: Mr. Patrick M. Shanahan Acting Secretary of Defense," April 25, 2019, p. 4, https://media.defense.gov/2019/Apr/25/2002120979/-1/-1/1/DODIG-%202019-082.PDF.

contracts. To mitigate such apparent conflicts of interest, numerous Biden appointees voluntarily agreed to this 4-year cooling-off period, including: OECD Ambassador Sean Patrick Maloney, who agreed to not work for the crypto industry;[17] members of the Federal Reserve Board of Governors, who agreed to not work for financial services companies;[18] and military leaders, namely Secretary of Defense Lloyd Austin[19] and Chairmen of the Joint Chiefs of Staff General Charles Q. Brown[20] and General John D. Caine,[21] who agreed not to work for defense contractors. By doing the same, you can mitigate concerns about your potential conflicts of interest in this role.

Finally, you should commit, once and for all, not to lobby – either as a formal registered lobbyist or informal "shadow lobbyist" – DoD for 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. Multiple former DoD officials agreed to a post-employment lobbying ban, including Secretary of Defense Lloyd Austin and General Charles Q. Brown.[22] The American people must have confidence that the individual leading the U.S. Navy is not attempting to cash in on their insider knowledge, peddle their influence for personal gain, or secure future employment by favoring certain companies from their official position.

As you know, the Senate has a constitutional responsibility to evaluate nominees under the "advice and consent" power established in Article II, Section 2 of the Constitution.[23] By making these commitments, you can increase public confidence in your abilities and integrity. I urge you

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[17] Office of U.S. Senator Elizabeth Warren, "Warren Secures Unprecedented Ethics Commitments from OECD Ambassador Nominee; Former Congressman Sean Patrick Maloney Pledges Not to Work for Crypto Firms for Four Years After Government Service," press release, February 14, 2024, https://www.warren.senate.gov/newsroom/press-releases/warren-secures-unprecedented-ethics-commitments-from-oecd-ambassador-nominee-former-congressman-sean-patrick-maloney-pledges-not-to-work-for-crypto-firms-for-four-years-after-government-service/.

[18] Office of U.S. Senator Elizabeth Warren, "In Response to Senator Warren, Federal Reserve Nominees Make Historic Ethics Commitments," press release, February 10, 2022, https://www.warren.senate.gov/newsroom/press-releases/in-response-to-senator-warren-federal-reserve-nominees-make-historic-ethics-commitments/.

[19] 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/.

[20] Office of U.S. Senator Elizabeth Warren, "At Hearing, Warren Secures Ethics Commitment Joint Chiefs of Staff Nominee General Brown; Reiterates Concern Over Senior Military Holds," press release, July 11, 2023, https://www.warren.senate.gov/newsroom/press-releases/at-hearing-warren-secures-ethics-commitment-joint-chiefs-of-staff-nominee-general-brown-reiterates-concern-over-senior-military-holds/.

[21] Office of U.S. Senator Elizabeth Warren, "At Hearing, Warren Secures Ethics Commitment from Joint Chiefs of Staff Nominee," press release, April 1, 2025, https://www.warren.senate.gov/newsroom/press-releases/at-hearing-warren-secures-ethics-commitment-from-joint-chiefs-of-staff-nominee/.

[22] Office of U.S. Senator Elizabeth Warren, "At Hearing, Warren Secures Ethics Commitment Joint Chiefs of Staff Nominee General Brown; Reiterates Concern over Senior Military Holds," press release, July 11, 2023, https://www.warren.senate.gov/newsroom/press-releases/at-hearing-warren-secures-ethics-commitment-joint-chiefs-of-staff-nominee-general-brown-reiterates-concern-over-senior-military-holds/; 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/.

[23] U.S. Constitution, article II, section 2.

to demonstrate your commitment to serving the American people – rather than special interests – by replying in writing to the following questions by November 30, 2026:

1. Will you commit, if confirmed, to recuse yourself from all particular matters involving CACI International Inc. and other former clients and employers, for at least four years while serving as Navy Secretary?
    a. If so, will you commit to establishing a third-party recusal screening process in order to do so? Please detail the screening process you will establish and how it will ensure that you are not involved in matters that could benefit your former employer.
2. Will you commit to recuse for at least four years from any acquisition policy decisions that would impact CACI International Inc. and other former clients and employers?
3. Will you commit to neither seek nor accept a waiver from any recusal involving your former clients and employers for at least four years?
4. Will you commit not to seek employment or board membership with, or another form of compensation from, a company that the Navy contracts or you otherwise interact with while in government for at least four years after leaving office?
5. Will you commit not to lobby DoD – including work as an information "shadow lobbyist" – for at least four years after leaving office?
6. Will you commit to notifying Congress of any changes to your ethics agreement?
7. Have you requested or obtained any ethics waivers since joining DoD in 2025?
    a. Have you requested or obtained any waivers, exemptions, or authorizations pursuant to 18 U.S.C. § 208(b)(l), 18 U.S.C. § 208(b)(2), or 5 C.F.R. § 2635.502(d)?[24]
    b. Will you commit to notifying Congress of any ethics waivers, exemptions, or authorizations that you seek or obtain as Secretary of the Navy?
8. Have you made any stock or securities trades within the last year?
    a. Please provide a full list of any trades.
9. Have you had any personal contact with CACI employees since joining DoD in October 2025, and if so, with whom?
10. Did CACI compensate you for entering into federal service?
    a. Please explain the $32,328 severance payment received from CACI upon your departure. What was the contractual or policy basis for the payment?[25]
    b. Please explain the $75,000 bonus payment from CACI. What performance period did the bonus cover?[26]
    c. Please provide further details on the $84,172 in restricted stock units from CACI. Did CACI accelerate the vesting, settlement, or payment of any RSUs, or otherwise provide you with any special equity treatment, discretionary cash settlements, or replacement compensation for equity that may have been forfeited?[27]

[24] 18 U.S.C. § 208(b)(l); 18 U.S.C. § 208(b)(2); 5 C.F.R. § 2635.502(d).
[25] Hung Cao, Public Financial Disclosure Report (OGE Form 278e), September 10, 2026, https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/DC68D18B037ABF4185258E7F002D9A23/$FILE/Cao%2C%20Hung%20%20final278.pdf.
[26] *Id.*
[27] *Id.*

d. When did you first tell CACI that you were being considered for a position in the Trump administration?
e. Were any payments from CACI International contingent on your acceptance, confirmation, or commencement of a position in the Department of the Navy?

Sincerely,

Elizabeth Warren
United States Senator