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November 18, 2026

Vice Admiral Richard Breckenridge
Principle Civilian Deputy to the Assistant Secretary of the Navy for Research, Development, and Acquisition
U.S. Department of the Navy
1000 Navy Pentagon
Washington, D.C. 20350-1200

Dear Vice Admiral Breckenridge:

Congratulations on your nomination to serve as the Assistant Secretary of the Navy for Research, Development, and Acquisition.[1] If confirmed, you would be responsible for serving as the Navy's top acquisition executive and have "authority, responsibility, and accountability for managing research, development, and acquisition activities across the service" and "for [the] enforcement of Under Secretary of Defense for Acquisition, Technology and Logistics procedures."[2] In this role, you would oversee the Navy's efforts to procure weapons, systems, and platforms for the Navy and Marine Corps.[3] However, given your recent senior executive roles at Northrop Grumman and that you continue to retain stock in major defense and Navy contractors, I am concerned that you will enter into this role with serious conflicts of interest.

I write to request that you mitigate those conflicts of interest by committing to: (1) recuse yourself from all specific-party particular matters involving your former employer for four years and to establish a third-party recusal screening process in order to do so; (2) divest all stock you currently hold in companies that contract with the Department of Defense (DoD) or the Navy; (3) not seek compensation from a firm that is heavily invested in the defense industry, a defense contractor, or other entity that does business with DoD or the Navy for a period of at least four years after you leave office; and (4) not lobby DoD or the Navy – including work as an informal "shadow lobbyist" – for at least four years after leaving office.

Your Work as a Senior Executive for a Top Defense Contractor

[1] U.S. Naval Institute News, "Cao, Toti, Breckenridge Formally Nominated for Top Navy Jobs," Sam Lagrone, September 15, 2026, https://news.usni.org/2026/09/15/cao-toti-breckenridge-formally-nominated-for-top-navy-jobs.
[2] U.S. Department of the Navy, "Research, Development, and Acquisition," https://www.navy.mil/Research-Development-and-Acquisition/; U.S. Department of the Navy, "ASN(RDA) Overall Structure," https://www.secnav.navy.mil/rda/Pages/ASNRDAOrgChart.aspx.
[3] U.S. Department of the Navy, "Research, Development, and Acquisition," https://www.navy.mil/Research-Development-and-Acquisition/.

Directly following your service in the Navy, you became vice president at Northrop Grumman in January 2018, and remained in high-level positions at the company until August 2025.[4] You held roles as vice president of corporate government relations; vice president of aeronautics sector – strategy and growth; and vice president of marine systems business unit.[5] After leaving Northrop Grumman, you joined DoD as a senior advisor to Deputy Secretary Feinberg for shipbuilding improvement from September 2025 to May 2026.[6] You then became a senior advisor to the Secretary of the Navy for Shipbuilding from June 2026 to August 2026, and since September 2026, you have served as the principle civilian deputy to the Assistant Secretary of the Navy for Research, Development, and Acquisition.[7]

The revolving door between giant defense contractors and DoD sows distrust about whether senior Pentagon leaders are acting in the best interest of our national security and service members or in the best interest of contractors trying to line their pockets with taxpayer dollars. Your employment history with Northrop Grumman will raise questions about your role overseeing the Navy's efforts to procure weapons, systems, and platforms that involve the company, and I request additional information about decisions you made during your time at DoD since 2025.

Northrop Grumman is a major contractor, both for the broader DoD and the Navy. According to the most recent available federal contracting data, Northrop Grumman was the fourth largest contractor for DoD, receiving about $18.6 billion in fiscal year (FY) 2024, and the sixth largest contractor for the Navy, receiving over $5.1 billion during that same time period.[8] More recently, in September 2025, the Naval Sea Systems Command awarded Northrop Grumman a contract worth up to $103.6 million for supplying production units and maintenance assistance modules supporting the AN/WSN-12 Inertial Navigation System.[9] In October 2026, Northrop Grumman also announced that the Navy was increasing the maximum value of one of its existing contracts for the production of an electronic bomb fuze by approximately $97 million.[10]

Your ethics commitments have allowed for the possibility that you will make decisions in matters directly affecting your former employer, Northrop Grumman, in the coming years. You agreed to divest from all your financial interests in Northrop Grumman and to "not participate personally and substantially in any particular matter that to [your] knowledge has a direct and predictable effect on the financial interests of the company until [you] have divested it."[11] After which,

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[4] U.S. Senate Committee on Armed Services, "Nomination Reference and Report PN1273-2," September 14, 2026, p. 2, [on file with the Office of U.S. Senator Elizabeth Warren].
[5] *Id*.
[6] *Id*.
[7] *Id*.
[8] SAM.gov, "Top 100 Contractors Report FY 2024," DoD (9700) and Navy (1700), https://sam.gov/api/prod/databank/v1/reports/static/download?fileName=Top_100_Contractors_Report_Fiscal_Year_2024&fileType=xlsx&api_key=null.
[9] HigherGov, "Northrop Grumman Wins $104 Million Navy AN/WSN-12 Navigation System Contract," October 3, 2026, https://www.highergov.com/news/northrop-grumman-wins-104-million-navy-an-wsn-12-6490188/.
[10] Northrop Grumman, "Northrop Grumman Increases Production of Combat-Proven Electronic Bomb Fuze," press release, October 29, 2026, https://news.northropgrumman.com/armaments/northrop-grumman-increases-production-of-combat-proven-electronic-bomb-fuze.
[11] Letter from Nominee Richard Breckenridge to Alternate Designated Agency Ethics Official Danice Irvine, September 15, 2026, p. 2,

pursuant to Section 1117 of the National Defense Authorization Act for Fiscal Year 2022, you also agreed that you would "not knowingly participate personally and substantially in any particular matter involving specific parties" in which you know Northrop Grumman "is a party or represents a party" for a period of two years after your resignation from Northrop Grumman, which occurred in August 2025.[12] These commitments mean that you may participate in these matters beginning in August of next year.

If you were to participate in a decision about a Northrop Grumman 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 address these concerns, I urge you to recuse yourself from participating personally and substantially in any particular matters involving specific parties in which you know that Northrop Grumman is a party or represents a party for four years. 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.[13] 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.[14] 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."[15] You should likewise set up a process for a third-party staff member to screen all matters to determine whether they involve Northrop Grumman so that you are not sowing doubt into the minds of service members and the American people as to whether you are making decisions to steer contracts to your former employer, rather than on the basis of taxpayer costs and national security.

Stock in Several Top Defense Contractors Raises Ethics Concerns

Additionally, I am concerned that you have not agreed to divest from several assets you have reported holding from major defense contractors for the Navy or DoD, including:

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https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/D8E07B3583AF556885258E7E002DE5E1/$FILE/Breckenridge%2C%20Richard.%20%20finalEA.pdf.

[12] *Id*., p. 3.

[13] 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.

[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] 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.

- Up to $50,000 of stock in NVIDIA Corp.[16]
- Up to $15,000 of stock in Oracle Corp.[17]
- Up to $15,000 of stock in Palantir.[18]
- Up to $15,000 of stock in International Business Machines Corp. (IBM).[19]
- Up to $15,000 of stock in Dell Technologies Inc. Cl C.[20]
- Up to $15,000 of stock in Honeywell International, Inc.[21]
- Up to $15,000 of stock in Intel Corp. [22]
- Up to $15,000 of stock in Cisco Systems, Inc.[23]
- Up to $15,000 of stock in Palo Alto Networks, Inc.[24]

In May 2026, NVIDIA and several other companies reportedly struck a deal with DoD "to deploy their advanced AI [artificial intelligence] capabilities on the Department's classified networks for lawful operational use."[25] The Navy has also recently contracted with a company to support the use of NVIDIA H200 NVL Graphics Processing Units (GPUs) and has begun using a NVIDIA DGX GB300 supercomputer, the first time one has been used within the military.[26] Given NVIDIA's involvement with DoD programs, your continued holding of NVIDIA stock could raise questions about the impartiality of your research, development, and acquisition decisions.

Oracle has similarly been expanding its agreements with DoD and the Navy. Oracle also struck an agreement with DoD in May 2026 to deploy its AI tools on classified networks,[27] and it has contracted with the Navy recently as well. In July 2026, DoD "announced a historic up to 10-year, near $7 billion Enterprise Software Agreement (ESA) with Oracle" to "advance[e] the Arsenal of Freedom" that the Navy negotiated.[28] Additionally, when Oracle agreed to share its AI tools with

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[16] Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e), Richard Breckenridge, September 24, 2026, p. 7, [on file with the Office of U.S. Senator Elizabeth Warren].
[17] *Id*., p. 9.
[18] *Id*., p. 10.
[19] *Id*. p. 11.
[20] *Id*.
[21] *Id*., p. 13.
[22] *Id*., p. 8.
[23] *Id*.
[24] *Id*., p. 9.
[25] U.S. Department of Defense, "The War Department Announces Agreements with Leading AI Companies to Deploy Capabilities on Classified Networks," press release, May 1, 2026, https://www.war.gov/News/Releases/Release/Article/4475177/classified-networks-ai-agreements/.
[26] Saitech, "Saitech Inc. Awarded NVIDIA H200 GPU Contract Supporting U.S. Navy's Advanced Computing Requirements," press release, https://www.saitechincorporated.com/saitech-inc-awarded-nvidia-h200-gpu-contract-supporting-u-s-navys-advanced-computing-requirements/; Post on Facebook by Saitech Inc., October 19, 2026, https://www.facebook.com/esaitech/posts/exciting-news-from-saitech-incwere-proud-to-announce-that-saitech-inc-has-been-a/1589983379810301/; Military.com, "Navy Brings US Military's First AI Supercomputer of Its Kind Online," Haley Fuller, September 6, 2026, https://www.military.com/navy-brings-us-militarys-first-ai-supercomputer-of-its-kind-online.
[27] Bloomberg, "Microsoft, Amazon Hand Pentagon More Control Over AI Systems," Katrina Manson, May 1, 2026, https://www.bloomberg.com/news/articles/2026-05-01/nvidia-microsoft-aws-expanding-classified-military-ai-use.
[28] U.S. Department of Defense, "DOW Awards a Nearly $7 Billion Oracle Agreement to Accelerate the Arsenal of Freedom," press release, July 23, 2026, https://www.war.gov/News/Releases/Release/Article/4554042/dow-awards-a-nearly-7-billion-oracle-agreement-to-accelerate-the-arsenal-of-fre/.

DoD for use on its classified networks, its shares jumped up 6.5 percent;[29] if you are in this role, you will have the ability to make decisions that could similarly benefit Oracle and benefit yourself financially by increasing the value of its stock.

Palantir has also been making significant contracting inroads with DoD, including the Navy. In December 2025, the Navy and Palantir announced a deal worth up to $448 million to integrate Palantir's "advanced AI software into multiple public and private shipyards and suppliers to optimize naval construction and readiness, and help surge U.S. nuclear submarine production under the second Trump administration."[30] This new "contract mark[ed] a significant expansion with the Navy for Palantir, which has contracts with the service going back at least a decade."[31] Earlier this month, Palantir reported in its most recent quarter data that its "U.S. government revenue grew 96% year-over-year and 18% quarter-over-quarter to $953 million."[32] Last year, the *Financial Times* reported that Palantir has "hired extensively from government agencies critical to its sales" including senior defense and legal officials, and has developed a "sprawling influence network which includes: deep ties with [its] largest client, the Department of Defense."[33] Both you and the company could benefit financially if you make decisions in this role that steer Navy research, development, or acquisition agreements toward Palantir.

IBM is also a significant contractor for the Navy and DoD. It was a top-100 contractor for both the Navy and DoD in FY 2024, receiving over $238.2 million from the Navy and nearly $508.7 million from DoD.[34] The Navy has held significant contracts with IBM to support its Navy Enterprise Resource Planning (ERP) platform, which serves as the Navy's financial record system.[35] For example, since 2021, IBM has had a contract with the Navy worth up to $1 billion for Navy Enterprise Resource Planning Technical Support Services with a potential end date in 2026.[36]

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[29] Bloomberg, "Microsoft, Amazon Hand Pentagon More Control Over AI Systems," Katrina Manson, May 1, 2026, https://www.bloomberg.com/news/articles/2026-05-01/nvidia-microsoft-aws-expanding-classified-military-ai-use.
[30] Defense Scoop, "How the new Navy-Palantir 'ShipOS' partnership is informed by Project Maven," Brandi Vincent, December 23, 2025, https://defensescoop.com/2025/12/23/palantir-navy-shipos-partnership-informed-by-project-maven/.
[31] The Wall Street Journal, "Navy Strikes Deal With Palantir for AI Overhaul of Submarine Maintenance," Marcus Weisgerber and Heather Somerville, December 9, 2025, https://www.wsj.com/business/logistics/navy-strikes-deal-with-palantir-for-ai-overhaul-of-submarine-maintenance-848f15f2.
[32] U.S. Securities and Exchange Commission, "Palantir Reports Q3 2026 U.S. Comm Revenue Growth of 148% Y/Y and Revenue Growth of 96% Y/Y; Raises FY 2026 Revenue Guidance to 91% Y/Y Growth and U.S. Comm Revenue Guidance to 143% Y/Y, Crushing Consensus Expectations," press release, November 2, 2026, https://www.sec.gov/Archives/edgar/data/1321655/000132165526000045/a2026q3ex991pressrelease.htm.
[33] Financial Times, "Palantir's 'revolving door' with government spurs huge growth," Tabby Kinder and Cynthia O'Murchu, February 7, 2025, https://www.ft.com/content/a65c93af-abf9-427c-a2ee-a9f5b3d518b9?syn-25a6b1a6=1.
[34] SAM.gov, "Top 100 Contractors Report FY 2024," DoD (9700) and Navy (1700), https://sam.gov/api/prod/databank/v1/reports/static/download?fileName=Top_100_Contractors_Report_Fiscal_Year_2024&fileType=xlsx&api_key=null.
[35] Defense Finance and Accounting Service, "Navy Enterprise Planning (ERP)," https://www.dfas.mil/PDI/NavyERP/; USASpending.gov, Advanced Search: International Business Machines Corporation and Department of the Navy, as of November 11, 2026, https://www.usaspending.gov/search?hash=5598215c87398f3116d1cd0e92d90d3e.
[36] USASpending.gov, Contract Summary: PIID N0003921F3007, https://www.usaspending.gov/award/CONT_AWD_N0003921F3007_9700_N0017819D7876_9700.

Dell Technologies is another company in which you retain stock and that contracts with the Navy and DoD. It likewise is a top-100 contractor for both the Navy and DoD, and it received about $474.1 million from the Navy and about $2.2 billion from DoD in FY 2024.[37] In May 2026, DoD consolidated existing IT budgets across the services into a five-year $9.7 billion Core Enterprise Technology Agreement with Dell for it "to consolidate Microsoft software, services and licenses across the Department of Defense." [38] The Navy will have a significant role in this contract since it has been tasked with managing it.[39]

Honeywell is also a top defense contractor for DoD and the Navy. In FY 2024, it received nearly $115.7 million from the Navy, and it received about $1.4 billion from DoD.[40] Additionally, in September 2026, Honeywell was awarded a nearly $54 million sole-source contract through September 2031 "to supply components for Navy navigation systems" that support Navy submarines and surface ships.[41]

You also retain stock in several other companies that have received major contracts from DoD. For example, Intel Corp. received an award managed by DoD of up to $3 billion in funding from the *CHIPS and Science Act* to "support the manufacturing of microelectronics and ensure access to a domestic supply chain of advanced semiconductors for national security" in September 2024.[42] You also hold stock in Cisco Systems, Inc., with which DoD announced in September 2026 that it intended to establish a sole source indefinite delivery and indefinite quantity award for a Cisco Joint Enterprise License Agreement.[43] Additionally, you have stock in Palo Alto Networks, Inc., which has a multi-year contractual cybersecurity agreement with DoD for a Joint Enterprise License Agreement.[44] The Naval War College also has a history of being heavily reliant on Palo

[37] SAM.gov, "Top 100 Contractors Report FY 2024," DoD (9700) and Navy (1700), https://sam.gov/api/prod/databank/v1/reports/static/download?fileName=Top_100_Contractors_Report_Fiscal_Year_2024&fileType=xlsx&api_key=null.
[38] Breaking Defense, "Pentagon awards Dell $9.7 billion contract to consolidate software licenses," Mark Pomerleau, May 27, 2026, https://breakingdefense.com/2026/05/pentagon-awards-dell-9-7-billion-contract-to-consolidate-software-licenses/.
[39] *Id*.
[40] SAM.gov, "Top 100 Contractors Report FY 2024," DoD (9700) and Navy (1700), https://sam.gov/api/prod/databank/v1/reports/static/download?fileName=Top_100_Contractors_Report_Fiscal_Year_2024&fileType=xlsx&api_key=null.
[41] Investing.com, "Honeywell Aerospace awarded $53.9M Navy contract for navigation parts," Luke Juricic, September 18, 2026, https://www.investing.com/news/stock-market-news/honeywell-wins-539m-navy-contract-for-navigation-parts-93CH-4907932.
[42] The Defense Post, "Intel Bags $3B for Military-Grade Microchip Production in US," Rojoef Manuel, September 19, 2024, https://thedefensepost.com/2024/09/19/us-military-grade-microchip-production-intel/; U.S. Department of Defense, "Department of Defense & Department of Commerce Joint Statement: Announcement in Support of the Manufacture of Microelectronics and Advanced Semiconductors for National Security," press release, https://www.war.gov/News/Releases/Release/Article/3906926/department-of-defense-department-of-commerce-joint-statement-announcement-in-su/.
[43] SAM.gov, "Sole Source Notice of Intent - Sources Sought - Department of Defense (DoD)-wide Cisco Joint Enterprise License Agreement," September 8, 2026, https://sam.gov/workspace/contract/opp/81a56bbba61148009957b271192648eb/view.
[44] Palo Alto Networks, "Joint Enterprise License Agreement (JELA)," September 17, 2025, https://www.paloaltonetworks.com/resources/guides/joint-enterprise-license-agreement.

Alto Networks, which as of December 2025 was "currently the only known company who [could] provide equipment that is interoperable with NWC's systems."[45]

I urge you to divest from all of your stock holdings in any companies, including those mentioned above, that contract with DoD or the Navy. In doing so, you will better protect the integrity of your decision-making and make clear to service members and the American people that you are making decisions to support the warfighter, not to line your pockets.

Stopping the Revolving Door between DoD and Defense Contractors

In addition to divesting from defense contractors, if you are confirmed, I also ask you to commit to not seek employment, board membership, or any other form of compensation from any company that contracts with DoD or the Navy or that you otherwise interact with while in government for at least four years after leaving office. You already have a history of going through the revolving door, and if you immediately return to a defense contractor following your time at DoD, it will raise questions about whether you made acquisition decisions based on how they would benefit contractors attempting to curry favor with you and offering you a paycheck after your service.

Several Biden appointees who made a commitment to this four-year cooling-off period while they were in office, including Secretary of Defense Lloyd Austin[46] and General Charles Q. Brown,[47] the Chairman of the Joint Chiefs of Staff, who agreed not to work for defense contractors; the U.S. Mission to the Organization for Economic Cooperation and Development (OECD) Ambassador Sean Patrick Maloney, who agreed to not work for the crypto industry; and members of the Federal Reserve Board of Governors who agreed to not work for a financial services company.[48]

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[45] SAM.gov, "7B22 – Threat Prevention Subscription Renewal," December 1, 2025, https://sam.gov/workspace/contract/opp/c5dba77248f74a039950a402b6c6e036/view.

[46] 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/.

[47] 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/.

[48] 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/; Office of U.S. Senator Elizabeth Warren, "In Response to Senator Warren, FDA Commissioner Nominee Dr. Robert Califf Makes Strongest Ethics Commitments of Any Senior Biden Administration Official," January 31, 2022, press release, https://www.warren.senate.gov/newsroom/press-releases/-in-response-to-senator-warren-fda-commissionernominee-dr-robert-califf-makes-strongest-ethics-commitments-of-any-senior-biden-administration-official; Office of U.S. Senator Elizabeth Warren, "At Hearing, Senator Warren Announces Strong Ethics Commitments from Federal Reserve Vice Chair for Supervision Nominee Michael Barr," May 19, 2022, https://www.warren.senate.gov/newsroom/press-releases/at-hearing-senator-warren-announces-strong-ethics-commitments-from-federal-reserve-vice-chair-for-supervision-nominee-michael-barr/ ; Letter from Director NIH

Additionally, you should commit to not lobby DoD or the Navy for four years after leaving office, including as an informal "shadow lobbyist" – a way that former high-level officials attempt to leverage their influence and previous roles by not directly lobbying but by facilitating others in doing so.[49] The revolving door between lobbyists and government leaders undermines the credibility of the decisions those government officials made while in power and erodes Americans' faith in the federal government. Because of these serious concerns, multiple Biden appointees agreed to a post-employment lobbying ban, including Secretary Austin and Chairman Brown.[50] You should do the same. Otherwise, service members, their families, and Americans will question the integrity of your decisions in this role and whether you steered contracts towards certain companies for your own benefit, instead of that of the warfighter.

Questions Regarding Your Ethics Commitments

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. In order to fulfill my responsibilities with regard to your nomination before the Senate Armed Service Committee, and to better understand your commitment to serving the American people – and not to contractors or your own financial interests, I ask that you respond to the following questions no later than December 2, 2026:

1. Will you commit to recuse from participating personally and substantially in any particular matters involving specific parties in which you know that Northrop Grumman is a party or represents a party for four years?
    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. Please provide a list of your assets and stock with companies who contract with DoD or the Navy and the exact value of those assets and stock for each of them.
    a. Will you commit to divesting from all these companies, including NVIDIA, Oracle, Palantir, IBM, Dell, Honeywell, Intel, Cisco, and Palo Alto Networks?

Nominee Monica Bertagnolli to U.S. Senator Elizabeth Warren, August 11, 2023, https://www.warren.senate.gov/imo/media/doc/Bertagnolli%20Letter%20to%20Senator%20Warren%2008.2023.pdf.

[49] ProPublica, "Trump's Appointees Pledged Not to Lobby After They Leave. Now They're Lobbying," Derek Kravitz and Alex Mierjeski, May 3, 2018, https://www.propublica.org/article/trump-appointees-pledged-not-to-lobby-after-they-leave-now-lobbying; Mother Jones, "Former Trump Officials Signed a Pledge to Avoid Lobbying. At Least 33 of Them Have Found a Way Around It," Derek Kravitz, February 17, 2019, https://www.motherjones.com/politics/2019/02/former-trump-officials-signed-a-pledge-to-avoid-lobbying-at-least-33-of-them-have-found-a-way-around-it/.

[50] 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.

    b. Will you commit not to repurchase such holdings during your time in government service?
3. Will you commit not to seek employment or board membership with, or another form of compensation from, a company that you regulate or otherwise interact with while in government for at least four years after leaving office?
4. Will you commit not to lobby DoD – including work as an information "shadow lobbyist" – for at least four years after leaving office?
5. Will you commit to notifying Congress of any changes to your ethics agreement within ten days of having done so?
6. Have you requested or obtained any ethics waivers or other ethics opinions since joining DoD in September 2025? If so, please provide a copy of such waivers or opinions.
    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)? If so, please provide a copy of such waivers, exemptions, or authorizations.
    b. Will you commit to notifying Congress of any ethics waivers, exemptions, or authorizations that you seek or obtain as Assistant Secretary within ten days that you seek them and providing a copy of those ethics waivers, exemptions, or authorizations within ten days that you obtain them?
7. Have you filed any financial disclosure reports to DoD since joining it in September 2025?[51] If so, please provide a copy of such financial disclosure reports.
8. Since joining DoD in September 2025, have you participated in any particular matters involving NVIDIA, Oracle, Palantir, IBM, Dell, Honeywell, Intel, Cisco, Palo Alto Networks, or any other companies that have contracted with DoD and that you have currently have or at the time had assets or stocks in?
    a. If so, please describe the nature of these matters, the date on which you participated in them, whether you held assets or stock in the companies at that time or when you purchased them thereafter, and the value of such assets and stock in the companies at that time.
9. Since joining DoD in September 2025, have you advised the Department or otherwise participated in conversations regarding equity deals or loans?
    a. If so, please describe the nature of those conversations or advisements, including whether you advised the Department to provide equity deals or loans to specific companies, for which companies you advised them to do, whether you held assets or stocks in that company at the time you made that advisement or thereafter, the value or those assets or stock at the time you made that advisement or thereafter, and on what basis you advised the Department to do so.
10. Since joining DoD in September 2025 have you been involved in any program management or acquisition program management?
    a. If so, please detail which programs, contracts and the value of such contracts, and which companies were involved.
11. Have you ever been employed as a special government employee (SGE), highly qualified expert (HQE), or under a different authority while at DoD?

[51] U.S. Senate Committee on Armed Services, "Nomination Reference and Report PN1273-2," September 14, 2026, p. 2, [on file with the Office of U.S. Senator Elizabeth Warren].

    a. Please explain what authority you were serving under, the duration for which you served under that authority, and any corresponding ethics agreements that you made while in those roles.
12. Have you been required to sign any nondisclosure, confidentiality, non-disparagement, or similar agreement in a professional capacity since the end of your service in the Navy?
    a. If so, please describe the nature of such agreements and with whom they were made.
13. Did any individuals within DoD recruit you to join DoD during your time at Northrop Grumman or thereafter?
    a. If so, who did so and on what basis?
14. Have you made any stock or securities trades within the last year?
    a. Please provide a full list of any trades, the dates on which you made them, and the values of such trades.

Thank you for your attention to this matter.

Sincerely,

Elizabeth Warren
United States Senator