

Former Lobbyists Now Have Unlimited Access to Lead the Agencies They Lobbied

Executive branch officials hold powerful positions in government and make decisions that affect the daily lives of Americans. These officials should be focused on the needs of the public and avoid even the appearance that they are influenced by their own interests or those of private industries.

Unfortunately, President Donald Trump has nominated at least 21 former lobbyists to senior executive branch positions.¹ Contrary to the ethics rules of prior administrations, many of these nominees lobbied on behalf of the industries they now regulate, some as recently as [the month prior](#) to [their official nomination](#). This influx of former lobbyists into agency leadership roles demonstrates the need for Congress to codify the political appointee ethics pledge. President Trump has not implemented this once bipartisan practice, and as a result, numerous senior officials are currently serving in government with clear conflicts of interest.

THE PAST THREE ADMINISTRATIONS LIMITED THE ROLE OF LOBBYISTS IN THE EXECUTIVE BRANCH

Executive orders from presidents of both parties have required ethics pledges restricting the appointment of lobbyists to senior agency positions, but the current administration did not establish such rules. Under both the [Biden](#) and [Obama](#) administrations, registered lobbyists were prohibited from seeking or accepting employment with any executive agency they lobbied within the two years before their date of appointment.

Under the [first Trump administration](#), registered lobbyists were prohibited from participating in any particular matter they lobbied on within the two years before their appointment, as well as from participating in the specific issue area in which the particular matter falls.

AT LEAST EIGHT TRUMP NOMINEES WOULD HAVE BEEN BANNED OR HAD LIMITED ROLES UNDER PRIOR ETHICS RULES

Name	Position	Conflict of Interest (2023-2024)
Pam Bondi	Attorney General	Lobbied on behalf of client on issues under DOJ jurisdiction
Alex Dominguez	Deputy Assistant Administrator for Mobile Source, Environmental Protection Agency	Lobbied on behalf of client before the EPA and on issues under EPA jurisdiction
Jamieson Greer	U.S. Trade Representative, Executive Office of the President	Lobbied on behalf of a client before the USTR
Taylor Jordan	Assistant Secretary for Environmental Observation and Prediction, Department of Commerce	Lobbied on behalf of clients before the DoC and on issues under DoC jurisdiction
Ken Kies	Assistant Secretary for Tax Policy, Department of Treasury	Lobbied on behalf of clients before the DoT and on issues under DoT jurisdiction
Wayne Palmer	Assistant Secretary for Mine Safety and Health, Department of Labor	Lobbied on behalf of a client before the MSHA and on issues under MSHA jurisdiction
Aaron Szabo	Assistant Administrator for Air and Radiation, Environmental Protection Agency	Lobbied on behalf of a client before the EPA and on issues under EPA jurisdiction
Abigale Tardif	Principal Deputy Assistant Administrator of the Office of Air and Radiation, Environmental Protection Agency	Lobbied on behalf of a client before the EPA

¹ See Appendix: Former Lobbyists Appointed to The Trump Administration

THESE INDIVIDUALS HAVE SIGNIFICANT CONFLICTS WITHOUT SAFEGUARDS

The above individuals have clear and current conflicts of interest but, due to President Trump's failure to implement ethics rules, can be appointed to their positions with no safeguards to protect the public interest.

For example, Wayne Palmer, the Assistant Secretary of the Department of Labor for Mine Safety and Health, [lobbied the Mine Safety and Health Administration](#) in every quarter of 2023 and 2024 on behalf of the Essential Minerals Association. While Alex Dominguez, the Deputy Assistant Administrator for Mobile Sources of the Environmental Protection Agency [lobbied on behalf of the American Petroleum Institute](#) for the first two quarters of 2023. Both of these individuals will work directly with their former clients and will be put in the position of making decisions that will affect those companies less than two years after they represented them.

CONGRESS SHOULD PASS LEGISLATION TO PROTECT THE PUBLIC FROM CLEAR CONFLICTS OF INTEREST

Given President Trump's unwillingness to implement restrictions on executive branch lobbyists, we call on Congress to act by introducing legislation to codify the ethics requirements of prior administrations. Registered lobbyists should be banned from seeking or accepting employment with any executive agency they lobbied within the two years before their date of appointment. In the event registered lobbyists were appointed to an agency they did not lobby, they should still be prohibited from participating in any matter they lobbied on, or issues in which the particular matter falls, within the two years before their appointment.

No matter the party in power, Americans should be assured that government officials are acting in their interest and not for their own gain or their industry's benefit. To help restore trust in government, Congress must act.

For more information, please contact Jo Deutsch (jdeutsch@campaignlegalcenter.org) and Eric Kashdan (ekashdan@campaignlegalcenter.org).

Former Lobbyists Appointed to The Trump Administration

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APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
Gary Andres*	Dept of Health and Human Services	Abbott Laboratories Accenture Adult Daycare Coalition AIDS Healthcare Foundation American Association of Health Plans American Cancer Society American Hospital Association Americans for Affordable Climate Change Americas Community Bankers Babcock & Brown California Healthcare Institute Charles Schwab Coalition on HSA Coordination Coalition to Advance Healthcare Reform Colex & Associates Council of Federal Home Loan Banks DISCUS DRS Technologies Inc. EISAI Inc. Ephedra Committee of AHPA Erickson Retirement Communities ETSI Federation of American Hospitals FedEx (FDX Corporation) Food Distributors International Fruit of the Loom Genentech Inc. General Motors Company Genzyme GlaxoSmithKline Goldbug Google Inc. Grocery Manufacturers Association (Food Manufacturers Association) The HNTB Companies Hoover Partners HSBC (Household International) ICO Inmarsat Ventures PLC International Association of Fire Fighters Isis Pharmaceutical JM Family Enterprises Johnson Controls Inc. Energy Justice Project Justice Project/VVAF

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		<p> Level 3 Communications LLP Magellan Behavioral Health Inc. Massachusetts School Of Law MAXXAM Mentor Network MEP Management Services Inc. Michigan Biotechnology Institute Museum of Modern Art NABI Biopharmaceuticals National Ground Water Association National Assn of Recording Merchandisers National Aviary in Pittsburgh National Council on the Aging National Stock Exchange New York University School of Medicine Ogilvy PR/NCOA Ogilvy UDSMR (Ogilvy PR/MedImpact) Oregon Garden Foundation Pharmaceutical Research & Manufacturers of America PlanetRx Power Mobility Coalition Raritan Bay Medical Center Royal Indemnity Co. Sandy City Satellite Broadcasting & Communications Association Scooter Store Senior Care Pharmacy Alliance Silicon Valley Leadership Group Southern Wine & Spirits SpaceData International Sprint Teco Inc. Texas Mutual Insurance Todhunter Todhunter Inc./5010 Tufts University US Virgin Islands Senate Union Pacific UnitedHealth Group, Inc. (fka United Health Care) University of California University of Maryland College VeriSign/Network Solutions Western Governors Association Western Governors University The Wine Institute World Trade Center Properties LLC (fka Wachtel Lipton Rosen & Katz) </p>

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
Leslie Beyer*	Dept of the Interior	13 th Street Ltd. Altair Learning Management LLC Ohio Board of Regents
Pam Bondi	Dept of Justice	Alden Torch Financial, LLC Amazon.com American Kitchen Cabinet Alliance American Road & Transportation Builders Association Anderson Kill P.C. (for certain plaintiffs in "9/11" litigation) Balsam Brands, Inc. Bankers Financial Corporation Carnival North America LLC Children's Hospital Association Detroit International Bridge Company, Inc. Fidelity National Financial, Inc. Florida Sheriffs Association Florida Sheriffs Risk Management Fund General Motors LLC IGT Global Solutions KGL Investment Company KSCC Kreindler & Kreindler LLP (for certain plaintiffs in "9/11" litigation) Lathrop Gage LLP Lender's Consulting Group, LLC Major County Sheriffs of America, Inc. Major League Baseball NES Health Pulaski Law Firm, PLLC (on behalf of Business Interruption Group) Pulte Capital Partners, LLC Republic Services Procurement, Inc. The Geo Group, Inc. U.S. Institute Against Human Trafficking Uber Technologies, Inc. Varian Medical Systems
James Braid	White House	Heritage Action for America
Bill Briggs*	Small Business Administration	Advanced Association for Life Underwriting Advanced Micro Devices Aetna AgustaWestland North America Albietz & Samuel Law Corp. American Council of Life Insurers American Immigration Lawyers Association American International Group Inc. Assurant Group AT&T Services, Inc. BellSouth Corp. BioniCare Corp. BNFL

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		Bombardier Transportation Centre for Management & Technology Clean Energy Computer & Communications Industry Association The Council of Insurance Agents and Brokers (CIAB) Debt Advisory International Dickstein & Zerbi Dickstein Shapiro Morin & Oshinsky LLP Emergent BioSolutions Inc. Financial Services Coordinating Council Gate Safe GE Financial Assurance GlaxoSmithKline Greenville Hartford Life Jefferson Pilot Financial Kenwood Investments Loeffler Group Lytton Band of Pomo Indians Massachusetts Mutual Life Insurance Company Mutual of Omaha National Underground Railroad Freedom Center Natural Gas Vehicle Coalition New York Life Insurance Company Oracle America, Inc. Pacific Gas and Electric Company (fka PG&E Corporation) Pala Band of Mission Indians Qualcomm Incorporated Recording Industry Association of America Sprenger and Lang Sutter Health Tyco International (fka Tyco International (US)) Unisys Corporation United Auburn Indian Community UnumProvident Corp. Video Gaming Technologies Visa USA
Doug Collins	Dept of Veterans Affairs	Justice Action Network
Alex Dominguez	Environmental Protection Agency	American Petroleum Institute Archroma U.S. Inc. Biotechnology Innovation Organization (Bio) Braskem America, Inc. Clean Fuels Alliance America (fka National Biodiesel Board) Council on Radionuclides and Radiopharmaceuticals

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		EATON Jera Americas, Inc. Mirion Technologies National Corn Growers Association NRG Energy, Inc. Oneok Renewable Fuels Association Southwire Company
Sean Duffy	Dept of Transportation	Cleary Gottlieb Steen & Hamilton LLP (on behalf of Venezuela Creditor Committee) Diem Networks US, Inc. Enterprise Products Operating LLC Gramercy Funds Management, LLC Marcum LLP MetLife Group, Inc. (fka MetLife Services and Solutions, LLC) Partnership for Open Skies Polaris Industries S&P Global SAS Institute Inc.
Theodore Garrish*	Dept of Energy	Bechtel National Inc. CH2M Hill Companies Ltd. Nuclear Energy Institute, Inc.
Jamieson Greer	USTR	WeBuild – US Holdings Inc.
Dudley Hoskins*	Dept of Agriculture	American Horse Council
Taylor Jordan*	Dept of Commerce	AccuWeather Arianespace, Inc. Association for the Advancement of Artificial Intelligence Care Weather Technologies, Inc. Covax Data ESP Advisors (on behalf of Ocean Power Technologies) Ethereal Space Inc. Exail, Inc. FLYHT, Inc. GreenSight Ideanomics Interos Inc. KSAT Inc. Lynker MeetKai, Inc. Orbital Micro Systems PlanetiQ SmallSat Alliance Spatial Informatics Group (SIG) Spire Global, Inc. Stephenson Technologies Corporation

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		Ultra Safe Nuclear Corporation - Technologies Windborne Systems Inc. Woods Hole Oceanographic Institution Xerox Corporation Xplore Inc.
Nicholas Kent*	Dept of Education	Beauty Basics Inc. American Association of Cosmetology Schools Association of Private Colleges Aveda Institute Coalition (Informal Coalition) Goddard Systems, Inc. Perdoceo Education Corporation The Salon People, Inc.
Kenneth Kies*	Dept of Treasury	Aetna Akin Gump Strauss Hauer Feld Alliance Capital Altaba, Inc. Amerada Hess Corp. American Apparel Manufacturers Association American Association of Nurse Anesthetists American Automotive Leasing Association American Bankers Association American Council of Life Insurance American Council of Life Insurers (ACLI) American Forest & Paper Association American Institute of Certified Public Accountants American Investment Council American Waterworks Co. AmeriDream Anheuser-Busch Companies Inc. (previously reported as Anheuser-Busch Company) Arbitrage Relief Coalition Arch Capital Group Limited Archery Trade Association Asbestos Study Group Association of Home Appliance Manufacturers Association for Advanced Life Underwriting Automobile Manufacturers R&D Coalition Bank of America Blue Cross Blue Shield Association Brinker International Inc. CaptiveOne Advisors LLC Caterpillar Chevron USA Chrysler Corporation Cigar Association of America Inc. CIT Group Clark Consulting Clark/Bardes Clark/Bardes Consulting Federal Policy Group Coalition For Fair Tax Credits

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		<p>Coalition Of Corporate Taxpayers Coalition Of Trusts Coalition On COLI Conoco Conseco Finance Corp. Contract Manufacturing Coalition Cooper Industries Council for Energy Independence Council of Insurance Agents & Brokers Council on Foundations Cruise Lines International Association, Inc. DaimlerChrysler Corp. Darden Restaurants DCS Delphi Automotive Systems Deutsche Bank AG Dole Food Co. Inc. Donald Fisher Easton Sports Edison Electric Institute Edward Jones Elder Health Electrolux Employee Relocation Council Erickson Retirement Communalities Erwin & Co. Eversheds Sutherland LLP (on behalf of Core Petroleum LLC) Excel Legacy Corp. Fidelity Management & Research Film Rights Tax Coalition Financial Services Roundtable Finseca (previously reported as Association for Advanced Life Underwriting) Foundation Executives Group FSC 2000 Coalition FSC Coalition GAP GE Capital Genentech, Inc. General Electric Company General Motors Corporation Genie Energy, Ltd. Goldman Sachs Greater Houston Community Foundation Greeting Card Association Harris & Co. JK Headwaters Inc. HealthEquity Hess Corporation</p>

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		Household International HSBC North America Holdings IBM IKON Public Affairs INMC Mortgage Holdings Interest Allocation Coalition Intuit Investment Co. Institute John L. Wortham & Sons LLP Kars 4 Kids Inc. Latona Associates Leasing Coalition Magellan Health Services Inc Marathon Oil MatlinPatterson Matson Navigation Company Inc. Mckenna Long & Aldridge Meridian Investments Merry-Go-Round Enterprises Michelin North America Inc. Microsoft Corporation Mortgage Bankers Association Mortgage Insurance Companies of America Motion Picture Association of America Multinatl Tax Coalition Nabors Industries Ltd. Naegele Communications National Association of Mortgage Brokers National Association of Real Estate Investment Trusts National Federation of Independent Business National Mining Association Office Depot OnebBeacon Corp. Overseas Shipholding Group Owens Corning Pfizer, Inc. Placid Refining Co. Plum Creek Timber Company Inc. Post Apartment Homes Potomac Capital Investment Corp. Prudential Insurance Co. of America PWC Leasing Coalition PWC Structured Finance Coalition PWC US Group LLP (fka PriceWaterhouseCoopers) Ralston Purina Co. Real Estate Board of New York Repatriation Coalition Risk Management Alternatives S&P Global

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		<p>Sara Lee Branded Apparel SCANA Corporation Schering-Plough Corporation Section 170 Coalition Section 877 Coalition Shell Oil Co. SIFL Coalition Starwood Hotels and Resorts Worldwide Inc. Steam Generator Coalition Structured Finance Coalition Teco Energy Teco Holdings Inc. (fka Teco Energy, Inc.) Time Warner Toyota Motor Credit Corp Truck Renting and Leasing Association Tupperware Corporation Tyson Foods Inc. United Parcel Service United States Mortgage Insurance US Steel Corp. USEC Inc. Vermont Yankee Nuclear Power Corp. Viacom Visa USA Inc. Warburg Pincus LLC WaterReuse White Mountain Insurance Group Ltd. Wine and Spirits Wholesalers of America Inc. Xcel Energy</p>
Emil Michael*	Dept of Defense	<p>Biotechnology Innovation Organization Brotherhood of Maintenance of Way Employees</p>
Wayne Palmer*	Dept of Labor	<p>Alliance for Healthcare Competitiveness, LLC AstraZeneca Pharmaceuticals LP China-US Exchange Foundation Essential Minerals Association (fka Industrial Minerals Association-North Ameri)</p>
Reed Rubinstein*	Dept of State	<p>Chamber of Commerce of the U.S.A. Coalition of Fort Hood Heroes</p>
Gail Slater	Dept of Justice	<p>Roku, Inc.</p>
Aaron Szabo*	Environmental Protection Agency	<p>21st Century Fox Acacia Living, Inc. dba INVU Care AdvaMed The Advanced Medical Technology Association AICPA American Airlines, Inc. American Chemistry Council, Inc. American Forest & Paper Association, Inc. American Fuel and Petrochemical Manufacturers American Optometric Association</p>

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		<p>American Petroleum Institute (API) American Property Casualty Insurance Association (fka Property Casualty Insurers) American Retirement Association American Wind Energy Association Bank Policy Institute (fka The Financial Services Roundtable) Beam Inc. (previously reported as Fortune Brands Inc.) Bloomberg LP Blue Cross Blue Shield Association Boeing Company Bradford White Corporation Bread Financial (fka Alliance Data Systems Corporation) BSA, the Software Alliance (fka BSA Business Software Alliance Inc) The Chemours Company Children's Hospitals Association (fka National Association Of Children's Hospitals) Climate Advisers Creatures Great and Small CrossCountry Consulting Datamaxx Applied Technologies, Inc. DPSC USA Duke Energy Corporation Electronic Payments Coalition Ellwood Group, Inc. Emergent BioSolutions Inc. Exelon Corporation Federal Home Loan Bank of Dallas Fox Corporation Genworth Financial, Inc. Goldman Sachs Group, Inc. Hazmat TSDF Inc. Huntsman Corporation The Interstate Natural Gas Association of America Investment Company Institute Lennox International Inc. LG Chem, Ltd. Marketplace Lending Association Mastercard Worldwide Medline Industries LP Memora Health Microsoft Corporation Moog Inc. National Alliance for Public Charter Schools National Women's History Museum News Corporation NextEra Energy, Inc.</p>

APPOINTEE	DEPARTMENT OR AGENCY	CLIENTS OF FORMER LOBBYIST
		Noble Energy Northern Trust Company Ovintiv, Inc. (fka Encana Oil and Gas (USA), Inc.) Permian Strategic Partnership Pfizer, Inc. Promontory Interfinancial Network, LLC. PTC Therapeutics, Inc. Puerto Rico Department of the Treasury RAI Services Company Regions Financial Corporation RELX Inc. Resolution Copper Rio Tinto Services Inc. Samsung Semiconductor, Inc. SAP America, Inc. SI Group Client Services (fka Swisher) Streamlined Sales Tax Governing Board Stress Engineering Services, Inc. The Surety & Fidelity Association of America TD Bank, N.A. Tellurian, Inc. Tinuum Group, LLC Total System Services, Inc. TransCanada Pipelines USA Ltd. Transunion, LLC TSG Interactive Services Limited (fka Amaya Services Limited) U.S. Travel Association United By Interest, (on behalf of Hilcorp Energy Company) University Startups Verizon Communications Inc. and various subsidiaries The Walt Disney Company Whirlpool Corporation Worthington Industries, Inc.
Abigale Tardif	Environmental Protection Agency	American Fuel & Petrochemical Manufacturers Marathon Petroleum Company LP
Alex Wong	White House	Coupage, Inc.

* Nominated but pending Senate confirmation

Clients determined by searching the LDA database maintained by the Secretary of the Senate by lobbyist name. See Search LD-1 & LD-2 Reports By ..., United States Senate Lobbying Disclosure, <https://lda.senate.gov/filings/public/filing/search/> (last visited Mar. 4, 2025).