



June 4, 2025

Jamieson Greer
Acting Director, U.S. Office of Government Ethics
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Washington, DC 20024

submitted via ContactOGE@oge.gov

Dear Acting Director Greer:

Campaign Legal Center (CLC) writes to request that the U.S. Office of Government Ethics (OGE) conduct a review of whether current and former employees of the U.S. Department of Government Efficiency (DOGE) have violated the financial disclosure reporting requirements of the Ethics in Government Act (EIGA).¹ The lack of transparency surrounding DOGE and the widespread reporting of possible conflicts of interest by DOGE employees assigned to agencies across federal government warrants this review. Only 6 of the approximately 82 publicly identified DOGE employees are known to have filed financial disclosure statements required by EIGA.²

The review is urgently needed because many individuals affiliated with DOGE, including Elon Musk, have served as special government employees (SGEs) since January and may soon reach the 130-day legal limit on their temporary public service.³ The SGEs have outside employment interests that may raise criminal

¹ See 5 U.S.C. Ch. 131.

² These numbers represent what is publicly available as of June 3, 2025. See New York Times, *The People Carrying Out Musk's Plans at DOGE* (May 28, 2025), <https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html>; Avi Asher-Schapiro et. al., *Elon Musk's Demolition Crew*, ProPublica (May 7, 2025), <https://projects.propublica.org/elon-musk-doge-tracker/>; Chart, "Status of DOGE Employee Required Financial Disclosure Filings," *infra*.

³ An SGE is defined as "an officer or employee of the executive or legislative branch of the United States Government . . . who is retained, designated, appointed, or employed to perform, with or

conflict of interest concerns, but their financial disclosures are not available for public inspection.⁴ As the SGEs and other DOGE employees leave public service, they are subject to additional criminal conflict of interest laws under 18 U.S.C. § 207, and the financial disclosures are needed to effectively enforce these laws.

Information on financial disclosure compliance is critical for the preservation of the public's trust in the federal government and should be provided promptly. Reporting shows that DOGE employees are working to reshape the federal workforce despite massive unresolved conflicts of interest⁵—and that is just for employees whose financial interests are public knowledge. OGE should provide assurance to the public that DOGE employees doing consequential work across the government are complying with all ethics laws and rules applicable to them.

Unknown Status of DOGE Employees' Financial Interests Disclosures

DOGE is reportedly currently comprised of more than 70 employees, who may be temporary SGEs or permanent government employees.⁶ However, there is only limited information on the identities of those employees. Approximately 82 current or former DOGE employees have been identified in recent reporting, but many reportedly have retained outside employment and only 6 are known to have filed financial disclosures. More importantly, the vast majority of DOGE employees have potential conflicts of interest with their current or former employers, which include government contractors⁷ and companies regulated by agencies with embedded DOGE employees.⁸

without compensation, *for not to exceed one hundred and thirty days* during any period of three hundred and sixty-five consecutive days” 18 U.S.C. § 202(a) (emphasis added).

⁴ See Chart, “Status of DOGE Employee Required Financial Disclosure Filings,” *infra*.

⁵ Nick Robins-Early, *Elon Musk's DOGE Conflicts of Interest Worth \$2.37bn, Senate Report Says*, The Guardian (Apr. 28, 2025),

<https://www.theguardian.com/technology/2025/apr/28/elon-musk-doge-conflict-of-interest>; Campaign Legal Center, *CLC Complaint to Inspector General Regarding Musk Conflicts of Interest at FAA*, (Mar. 13, 2025),

<https://campaignlegal.org/document/clc-complaint-inspector-general-regarding-musk-conflicts-interest-faa>; Campaign Legal Center, *CLC Complaint to CFPB Inspector General Regarding Gavin Kliger*, (May 20, 2025), <https://campaignlegal.org/document/clc-complaint-cfpb-inspector-general-regarding-gavin-kliger>.

⁶ New York Times, *The People Carrying Out Musk's Plans at DOGE* (May 28, 2025), <https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html>.

⁷ DOGE employees have potential conflicts with government contractors like SpaceX, Boring Company, and Palantir.

⁸ DOGE employees have potential conflicts with companies like Tesla, Meta, and Neuralink, among others, that are heavily regulated by government agencies.

Status of Required Financial Disclosure Filings for DOGE Employees⁹

Name	Prior or Current Outside Positions Requiring Review for Potential Conflicts of Interest	FD Status
Daniel Abrahamson	Tesla	unknown
Justin Aimonetti	Dechert LLP	unknown
Jacob Altik	Weil, Gotshal & Manges LLP, New Civil Liberties Alliance	unknown
Anthony Armstrong	Credit Suisse, Morgan Stanley	unknown
Kathryn Armstrong Loving	unknown	unknown
Jennifer Balajadia	Boring Company	unknown
Alexandra T. Beynon	Mindbloom, Symphony.com, Goldman Sachs	unknown
Riccardo Biasini	Tesla, Boring Company	filed
Brian Bjelde	SpaceX	unknown
Akash Bobba	Bridgewater Associates, Meta, and Palantir	unknown
Ashley Boizelle	Amazon, Gibson, Dunn & Crutcher LLP	unknown
James Burnham	Vallecito Capital, King Street Legal, Jones Day	unknown
Nate Cavanaugh	Brainbase, FlowFi	unknown
Michael P. Cole	Shareholder Capital, LLC	unknown
Sam Corcos	Levels Health	unknown
Edward Coristine	Neuralink	unknown
Scott Coulter	Cowbird Capital	unknown
Clayton Cromer	unknown	unknown
Steve Davis	Boring Company, SpaceX	unknown
Stephen Duarte	SpaceX	unknown
Stephen Ehikian	Salesforce, Airkit.ai	unknown
Marko Elez	SpaceX	unknown
Luke Farritor	SpaceX	unknown
Conor Fennessy	unknown	unknown
Justin Fulcher	RingMD	unknown
Mattieu Gamache-Asselin	Alto Pharmacy, Facebook	unknown
Joe Gebbia	AirBnB, Tesla	unknown
Brady Glantz	SpaceX	unknown
Amy Gleason	unknown	unknown
Antonio Gracias	SpaceX, Tesla	unknown
Joshua A. Hanley	Williams & Connolly LLP	unknown
Christina Hanna	SpaceX	unknown

⁹ This list has been derived from various news outlets covering DOGE's work, including New York Times, *The People Carrying Out Musk's Plans at DOGE* and Asher-Schapiro et. al., *supra* note 1. It may be incomplete and may reflect DOGE employees who have already left DOGE.

Name	Prior or Current Outside Positions Requiring Review for Potential Conflicts of Interest	FD Status
Tyler Hassen	Basin Energy, Basin Industries, Basin Power, Wenzel Downhole Tool	unknown
Greg Hogan	Comma.ai	unknown
Nicole Hollander	X	unknown
Stephanie Holmes	BrighterSide HR	unknown
Erica Jehling	SpaceX	unknown
Thomas Kiernan	SpaceX	unknown
Gautier Cole Killian	Jump Trading	unknown
Gavin Kliger	Twitter, Databricks	filed
Keenan Kmiec	unknown	unknown
Tom Krause	Cloud Software Group	unknown
Jon Koval	Valor Equity Partners	unknown
Scott Langmack	unknown	filed
Sahil Lavingia	Gumroad, Pinterest	unknown
Jeremy Lewin	Munger Tolles & Olson LLP	unknown
Kendall M. Lindemann	McKinsey & Company, Russell Street Ventures	unknown
Tarak Makecha	Tesla	unknown
Ted Malaska	SpaceX	unknown
Katie Miller	Office of the Vice President, Department of Homeland Security	unknown
Clark Minor	Palantir	filed
Michael Alexander Mirski	TCC Management	unknown
Bryanne-Michelle Mlodzianowski	SpaceX	unknown
Aram Moghadassi	Neuralink	unknown
Justin Monroe	SpaceX	unknown
Brooks Morgan	Podium Education	unknown
Todd Newnam	Encore Technology Group	unknown
Donald Park	Ionic Partners	unknown
Noah Peters	Brewer, Attorneys & Counselors	unknown
Nikhil Rajpal	Tesla	unknown
Adam Ramada	Spring Tide Capital	unknown
Austin Raynor	Sullivan & Cromwell LLP	unknown
Payton Rehling	Valor Equity Partners	unknown
Ryan Riedel	SpaceX	unknown
Rachel Riley	McKinsey & Company	filed
Christopher Roussos	AllerVie Health, 24 Hour Fitness	unknown

Name	Prior or Current Outside Positions Requiring Review for Potential Conflicts of Interest	FD Status
Michael Russo	Artromick International, Prematics, Inc., MICROS Systems Inc., Shift4 Payments	unknown
Kyle Schutt	WinRed	unknown
Alexander Simonpour	SpaceX	unknown
Christopher Stanley	SpaceX	unknown
Amanda Scales	Uber	filed
Frank Schuler	Ornstein-Schuler	unknown
Ethan Shaoiran	unknown	unknown
Thomas Shedd	Tesla	unknown
Sam Smeal	SpaceX	unknown
Brad Smith	Russell Street Ventures, Aspire Health, CareBridge, Main Street Health	unknown
Katrine Trampe	unknown	unknown
Cary P. Volpert	Lindy Live	unknown
Jordan M. Wick	Waymo	unknown
Joanna Wischer	General Dynamics	unknown
Ryan Wunderly	Anduril Industries	unknown
Chris Young	Pharmaceutical Research and Manufacturers of America	unknown

OGE’s Authority to Publicly Release Status of DOGE Employees’ Financial Disclosures

OGE has the authority to conduct a compliance review for DOGE and release the findings. The OGE Director’s responsibilities include:

- “monitoring and investigating compliance with the public financial disclosure requirements of [the Ethics in Government Act] by officers and employees of the executive branch”;¹⁰
- “monitoring and investigating individual and agency compliance with any additional financial reporting and internal review requirements established by law for the executive branch”;¹¹
- “requiring such reports from executive agencies as the Director deems necessary,”¹² and

¹⁰ 5 U.S.C. § 13122(b)(3).

¹¹ *Id.* (b)(5).

¹² *Id.* (b)(10).

- “providing information on and promoting understanding of ethical standards in executive agencies.”¹³

To fulfill its responsibilities under EIGA, OGE is required to collect information from federal agencies detailing compliance with federal ethics laws, including financial disclosure requirements.¹⁴ For example, OGE annually collects data from agencies “to carry out its oversight role, to gain knowledge about individual agency ethics programs and the executive branch program, as a whole, and to make informed decisions about priorities and resource allocation.”¹⁵ This data is publicly released in Program Review Reports.

The creation of DOGE and the restructuring of the Office of Management and Budget/U.S. Digital Service to accommodate DOGE employees¹⁶ makes this data collection urgent. Specifically, OGE should conduct an extensive review and provide the public with a:

- Full accounting of employees onboarded as part of DOGE
- Determination of whether those employees complied with the appropriate financial disclosure requirements, whether public or confidential
- Determination of whether any DOGE employees were excluded from all or a portion of the confidential filing requirements
- Determination of whether the SGEs are complying with financial disclosure laws applicable to them, and those who are working or plan to work more than the 130-day limit are complying with financial disclosure laws applicable to their status

CLC is aware that OGE conducts reviews of cabinet-level agencies’ ethics programs every four years and requires agencies to provide answers about their ethics programs in the annual questionnaires, but we believe this additional review, in light of the circumstances surrounding DOGE’s role in the federal government, demands OGE’s immediate attention.

¹³ *Id.* (b)(14).

¹⁴ *Id.*(e)(1); 5 C.F.R. § 2638.207(a).

¹⁵ U.S. Off. of Gov’t Ethics, Program Advisory on 2024 Annual Agency Ethics Program Questionnaire, PA-24-04, [https://www.oge.gov/Web/OGEnsf/0/68F2F893195E4ACE85258B620050CFC4/\\$FILE/PA-24-04_2024%20Annual%20Agency%20Ethics%20Program%20Questionnaire.pdf](https://www.oge.gov/Web/OGEnsf/0/68F2F893195E4ACE85258B620050CFC4/$FILE/PA-24-04_2024%20Annual%20Agency%20Ethics%20Program%20Questionnaire.pdf).

¹⁶ *Id.*

Respectfully submitted,

_____/s/_____

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_____/s/_____

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_____/s/_____

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