



July 14, 2025

Jamieson Greer
Acting Director, U.S. Office of Government Ethics
250 E Street SW, Suite 750
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") investigate whether executive branch agencies are failing to release ethics documents to the public in violation of the Ethics in Government Act ("EIGA").

CLC has requested ethics documents, including public financial disclosure reports and conflict of interest waivers, concerning 117 public officials from 10 agencies. These requests were made using the ethics records request process, known as Form 201. In most cases, CLC's requests have gone unanswered, without even an acknowledgement of the requests. One agency, the Office of Personnel Management, has not released documents despite numerous requests sent over the course of a month.

The unreleased public records are important because the extensive conflicts of interest senior officials have reported¹ suggest that other newly appointed officials may have more conflicts that are not publicly disclosed. The failure of the agencies to release the information hides from the public whether unelected agency officials are using their government positions to serve their own financial interests. These officials include employees of the controversial Department of Government

¹ Campaign Legal Center, *Tracking the Trump Administration's Conflicts of Interest*, <https://campaignlegal.org/trump-administration-conflicts-of-interest>.

Efficiency (“DOGE”) who influence decision-making across the federal government without public knowledge of their compliance with ethics laws. More concerning is that an unusually large number of new employees have received complete waivers to the ethics rules without the required public explanation.² For these reasons OGE should promptly investigate and compel the release of the ethics records.

Unreleased Public Ethics Records³

Agency	Number of Public Officials	Ethics Document(s)
Federal Trade Commission	69	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ⁴
Office of Personnel Management	36	Any OGE form 278e (including New Entrant Reports and Annual Financial Disclosure Reports); any OGE form 278t (periodic transaction reports); any ethics agreements; any 18 U.S.C § 208 (b)(1) and (b)(3) waivers; any certificates of divestiture ⁵
Department of Health and Human Services	3	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ⁶
Department of Education	2	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ⁷
Department of Justice	2	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ⁸
Department of Commerce	1	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ⁹
Department of Homeland Security	1	Any OGE form 278e (including New Entrant Reports and Annual Financial Disclosure Reports); any OGE form 278t (periodic transaction reports); any ethics agreements

² OGE has recorded approximately 155 conflicts of interest waivers since the start of the Trump Administration.

³ As of close of business Thursday, July 10, 2025.

⁴ We requested these documents for 69 individuals on June 20, 2025 from rduarte@ftc.gov.

⁵ We requested these documents for 24 individuals on May 16, 2025 via fax to 1(202) 606-0082 (per guidance on OGE’s Agency Ethics Program Contact Information webpage). The requests were also emailed to ogcethics@opm.gov on May 16. On June 25, 2025, we sent a follow-up email to ogcethics@omp.gov on June 25, 2025 and mailed a physical copy of the requests via USPS. We requested these documents for 12 additional individuals on June 25 via fax and by USPS.

⁶ We requested these documents for three individuals on July 7, 2025 from ethics.financialdisclosure@hhs.gov.

⁷ We requested these documents for two individuals on July 7, 2025 from ogc.ethics@ed.gov.

⁸ We requested these documents for two individuals on July 7, 2025 from deo@usdoj.gov.

⁹ We requested these documents for one individual on July 7, 2025 from ethicsdivision@doc.gov and received a response stating that our inquiry had been assigned but the “office is currently short-staffed” and can typically “expect a response within 7-10 business days.”

Agency	Number of Public Officials	Ethics Document(s)
Department of State	1	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ¹⁰
Department of Veterans Affairs	1	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ¹¹
National Aeronautics and Space Administration	1	Conflict of interest waivers, 18 U.S.C. § 208(b)(1) & (b)(3) waivers ¹²

OGE's Authority to Investigate Agency Compliance with Ethics Laws

Federal agencies must provide the public with certain ethics records upon request. Pursuant to the EIGA, “[e]ach agency [and] each supervising ethics office in the executive [] branch, ... shall, within 30 days after any [financial disclosure] report is received ... permit inspection of such report by or furnish a copy of such report to any person requesting such inspection or copy.”¹³ The agencies must furnish the documents “regardless of whether the agency has reviewed or certified the report.”¹⁴ OGE has advised that while “limited delays may be unavoidable, agencies should take steps to minimize such delays and release reports as soon as possible.”¹⁵

Additionally, “[a] copy of an agency waiver issued pursuant to 18 U.S.C. 208 (b)(1) or (b)(3) shall be made available upon request to the public by the issuing agency,” in accordance with the same procedure laid out for furnishing public financial disclosure reports.¹⁶ Certificates of divestiture also must be made public using the same procedure.¹⁷

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

¹⁰ We requested these documents for one individual on July 7, 2025 from oge201request@state.gov.

¹¹ We requested these documents for one individual on July 7, 2025 from governmentethics@va.gov.

¹² We requested these documents for one individual on July 7, 2025 from ethicsteam@hq.nasa.gov.

¹³ 5 U.S.C § 13107(b)(1); 5 C.F.R. § 2634.603(c).

¹⁴ U.S. Off. of Gov. Ethics, Program Advisory on Prompt Release of Public Financial Disclosure Reports, PA-18-03,

[https://www.oge.gov/web/oge.nsf/0/F944B1EE5493BCA2852585BA005BEC29/\\$FILE/PA-18-03%20Prompt%20Release%20of%20Public%20Financial%20Disclosure%20Reports.pdf](https://www.oge.gov/web/oge.nsf/0/F944B1EE5493BCA2852585BA005BEC29/$FILE/PA-18-03%20Prompt%20Release%20of%20Public%20Financial%20Disclosure%20Reports.pdf).

¹⁵ *Id.*

¹⁶ 5 C.F.R. § 2640.304(a); *see* 5 C.F.R. § 2634.603.

¹⁷ 5 C.F.R. § 2634.1008.

- “monitoring and investigating compliance with the public financial disclosure requirements of [the EIGA] by officers and employees of the executive branch”;¹⁸
- “monitoring and investigating individual and agency compliance with any additional financial reporting and internal review requirements established by law for the executive branch”;¹⁹ and
- “requiring such reports from executive agencies as the Director deems necessary.”²⁰

To fulfill its responsibilities under the EIGA, OGE is required to collect information from federal agencies detailing compliance with federal ethics laws, including financial disclosure requirements.²¹ 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.”²² This data is publicly released in Program Review Reports.

Urgent Need for Public Disclosure of Ethics Documents

There is an urgent need for agencies to release these documents. The requests consist of financial disclosure documents and conflicts of interest waivers that must be made available to the public under the EIGA. Without access to financial disclosure reports, the public is unable to assess possible conflicts of interest. Without access to conflicts of interest waivers, the public is denied the opportunity to know the reasoning behind the excusal of an existing conflict of interest.

OGE has said that “[f]inancial disclosure is vital to promoting public confidence by increasing accountability and transparency for officials at the highest levels of government. Failure to make reports promptly available in response to appropriate requests significantly undermines this confidence.” OGE must determine whether agency ethics offices are complying with federal law or are illegally withholding ethics documents from the public.

¹⁸ 5 U.S.C. § 13122(b)(3).

¹⁹ *Id.* (b)(5).

²⁰ *Id.* (b)(10).

²¹ *Id.* (e)(1); 5 C.F.R. § 2638.207(a).

²² U.S. Off. of Gov’t Ethics, Program Advisory on 2024 Annual Agency Ethics Program Questionnaire, PA-24-04, [https://www.oge.gov/Web/OGE.nsf/0/68F2F893195E4ACE85258B620050CFC4/\\$FILE/PA-24-04_2024%20Annual%20Agency%20Ethics%20Program%20Questionnaire.pdf](https://www.oge.gov/Web/OGE.nsf/0/68F2F893195E4ACE85258B620050CFC4/$FILE/PA-24-04_2024%20Annual%20Agency%20Ethics%20Program%20Questionnaire.pdf).

Respectfully submitted,

_____/s/____

Kedric L. Payne
General Counsel, Vice President, and Sr.
Director, Ethics

_____/s/____

Delaney Marsco
Director, Ethics

_____/s/____

Sophia Gonsalves-Brown
Senior Researcher, Campaign Finance and
Ethics