



April 23, 2026

Inspector General John Walk
U.S. Department of Agriculture Office of the Inspector General
1400 Independence Avenue SW
Washington, D.C. 20250

Sent via <https://hotline.oig.usda.gov/>

Dear Inspector General Walk:

The Campaign Legal Center (“CLC”) writes to request that the U.S. Department of Agriculture (“USDA”) Office of the Inspector General (“OIG”) investigate whether the USDA Secretary Brooke Rollins violated federal laws, ethics regulations, and her ethics agreement by maintaining close ties with her former employers and clients, America First Policy Institute (“AFPI”), Texas Public Policy Foundation (“TPPF”), America First Works (“AFW”), and the Mouradian Foundation. First, Rollins agreed to refrain from participating personally and substantially in any particular matter involving specific parties where her former employers were or represented a party for one year, in accordance with the requirements of the impartiality regulation.¹ Despite this, Rollins made at least four appearances before events hosted by AFPI and TPPF in her official capacity throughout 2025. Second, Rollins may have received a covered payment under 5 C.F.R. § 2635.503 from AFPI prior to entering government service, which would extend her recusal obligations towards AFPI for up to two years. Finally, public information suggests that Rollins has not fully resigned from her senior positions with outside entities TPPF and AFW, in addition to continuing to provide services to her former clients TPPF and Mouradian Foundation. The culmination of these

¹ Brooke Rollins Ethics Agreement (Jan. 14, 2025), [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/FFDDFE668696A85185258C150032F48D/\\$FILE/Rollins%2C%20Brooke%20%20finalEA.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/FFDDFE668696A85185258C150032F48D/$FILE/Rollins%2C%20Brooke%20%20finalEA.pdf); 5 C.F.R. § 2635.502.

facts suggests that Rollins has failed to comply with her ethics agreement and federal ethics laws since becoming USDA Secretary.

Public officials are expected to act impartially and not give preferential treatment to any private organization or individual.² The public has a right to know that government officials are using their positions in service of the public's best interest and not favoring the interests of their former employers or clients.³ The potential ethics issues surrounding Rollins's appearances before her former employers, recusal timeline errors, and continued affiliations with outside organizations demand a wide-ranging OIG fact finding. The USDA OIG should investigate and determine (1) if Rollins violated her ethics agreement by making official appearances before her former employers; (2) if Rollins received a covered payment from her former employer prior to entering government service; and (3) if Rollins fully resigned from her positions with outside entities and cut ties with her former employers and clients as required by her ethics agreement.

I. Federal Regulations Require Presidentially-Appointed, Senate-Confirmed Officials to Recuse from Certain Matters Involving Former Employers

The impartiality regulation requires federal employees to avoid the appearance of a loss of impartiality ("impartiality concerns") when performing their official duties. Federal employees are advised to abstain from particular matters involving specific parties in which they know that an entity whom they have a "covered relationship" with is a party or represents a party.⁴ An employee has a covered relationship with "[a]ny person for whom the employee has, **within the last year**, served as **officer, director**, trustee, general partner, agent, attorney, consultant, contractor, or **employee**."⁵ When the covered relationship is with a former employer, the recusal requirement is for a period of one year after the date of the employee's resignation from their position with the former employer.⁶

To mitigate impartiality concerns for very senior officials, the U.S. Office of Government Ethics ("OGE") requires presidentially-appointed, Senate-confirmed ("PAS") officials within the executive branch to recuse from particular matters involving specific parties in which an entity that they held an outside position with

² Exec. Order No. 12674 (April 12, 1989).

³ See *id.*; 5 C.F.R. § 2635.502(b)(1)(iv).

⁴ 5 C.F.R. § 2635.502(a)(2).

⁵ 5 C.F.R. § 2635.502(b)(1)(iv) (emphasis added).

⁶ 5 C.F.R. § 2635.502(e).

is a party or represents a party for one year after their resignation. This recusal requirement is included in all PAS officials' ethics agreements.⁷

For purposes of the impartiality regulation, OGE has generally viewed the decision to give an official speech to an outside entity as a particular matter involving the event sponsor as a specific party.⁸ If a PAS official has a covered relationship with the sponsor of the event—for example, if the sponsor is a former employer—then the PAS official should not participate in an official speech absent an authorization under section 2635.502(d).⁹ To avoid impartiality concerns, OGE and agency ethics officials often advise that, even when an employee is cleared to give an official speech at an event sponsored by a former employer, the “employee should not use the same organization as a preferred forum for repeated speeches when other comparable forums are available.”¹⁰

II. Rollins was Prohibited from Appearing at Events Where Her Former Employers Were a Party for a One-Year Recusal Period

Then-President-elect Donald Trump announced his nomination of Brooke Rollins to be the USDA Secretary on November 23, 2024.¹¹ She subsequently filed her nominee financial disclosure report on January 8, 2025, which was certified by OGE on January 15, 2025.¹² In her financial disclosure report, Rollins disclosed AFPI as a current employer where she served as the president, CEO, and board member. Rollins also disclosed TPPF both as a current employer where she served as a Senior Advisor to the Board and as a client of her consulting firm, BLR Ideas Corp., of which she was the sole proprietor.¹³

Upon confirmation by the Senate on February 13, 2025, Rollins, as a cabinet-level Secretary, became a PAS employee.¹⁴ As such, she also became subject to the impartiality federal ethics regulation and was required to comply with an ethics

⁷ U.S. Off. of Gov't Ethics Legal Advisory 23-15: Review of Nominees for Presidentially Appointed, Senate-Confirmed Positions, at 4 (Dec. 20, 2023).

⁸ U.S. Off. of Gov't Ethics Memorandum 09-020: Ethics Pledge Issues: Speeches and Pledge Paragraph 2; Intergovernmental Personnel Act Detailees, at 2 (May 26, 2009) (citing OGE Memorandum 98x14 and OGE Memorandum 94x14).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Statement by President-elect Donald J. Trump Announcing the Nomination of Brooke L. Rollins as Secretary of Agriculture*, The American Presidency Project (Nov. 23, 2024), <https://www.presidency.ucsb.edu/documents/statement-president-elect-donald-j-trump-announcing-the-nomination-brooke-l-rollins>.

¹² Public Financial Disclosure Report for Brooke Rollins, OGE Form 278e (Jan. 8, 2025), [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/86CB873AEB79F48885258C150032ED18/\\$FILE/Rollins%2C%20Brooke%20%20final278.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/86CB873AEB79F48885258C150032ED18/$FILE/Rollins%2C%20Brooke%20%20final278.pdf).

¹³ *Id.* at Part 4; Brooke Rollins Ethics Agreement, *supra* note 1, at Section 3.

¹⁴ *PLUM Reporting*, U.S. Off. of Pers. Mgmt., <https://www.opm.gov/about-us/open-government/plum-reporting/plum-data/> (last visited Apr. 23, 2026).

agreement. According to her ethics agreement, dated January 14, 2025, Rollins promised to “not participate personally and substantially in any particular matter involving specific parties in which I know [AFPI or TPPF] is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).”¹⁵ This recusal obligation extended for one year after her confirmation and resignation from AFPI and TPPF, until February 13, 2026.

In her Certification of Ethics Agreement Compliance, Rollins attested under the false statements statute, 18 U.S.C. § 1001, that she was continuing to recuse from particular matters in which her former employers were or represented a party unless she received authorization from an ethics official pursuant to 5 C.F.R. § 2635.502(d).¹⁶ Importantly, according to the Certification, Rollins was *not* granted an authorization to participate in particular matters involving specific parties in which AFPI or TPPF is a party or represents a party.¹⁷

III. Rollins May Have Violated Federal Regulations and Her Ethics Agreement by Appearing in Her Official Capacity at AFPI- and TPPF-Hosted Events

Despite the clear recusal obligations required by the impartiality federal ethics regulation and her ethics agreement, the attestation that she was complying with those recusals, and lack of an ethics authorization, Rollins made numerous personal appearances before her former employers throughout 2025 in violation of federal regulations.¹⁸ Those personal appearances are as follows:

A. TPPF Texas Policy Summit in February 2025

Just days after her February 13, 2025, confirmation to be USDA Secretary, Rollins appeared as the opening keynote speaker at TPPF’s 2025 Annual Policy Summit on February 19, 2025.¹⁹ She opened her TPPF speech by referencing her confirmation hearing and swearing in by Justice Clarence Thomas to her Secretary position. Rollins then referenced her 2018 departure from TPPF to join the first Trump administration, saying, “[W]hen I left seven years ago and walked away

¹⁵ Brooke Rollins Ethics Agreement, *supra* note 1, at Section 2.

¹⁶ Brooke Rollins Ethics Agreement Compliance Certification (Feb. 18, 2025), [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/CB996E3BE9EABE4285258C5F002C293E/\\$FILE/Brooke%20Rollins-Ethics%20Agreement%20Compliance%20Certification%20\(USDA%20Secretary\).pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/CB996E3BE9EABE4285258C5F002C293E/$FILE/Brooke%20Rollins-Ethics%20Agreement%20Compliance%20Certification%20(USDA%20Secretary).pdf).

¹⁷ *Id.*

¹⁸ Rollins used her official government title at these appearances, which also suggests that she invoked her official title in violation of 5 C.F.R. § 2635.807(b).

¹⁹ Tex. Pub. Pol’y Found., *Texas Policy Summit 2025 – Secretary Brooke Rollins*, YouTube (Feb. 19, 2025), https://www.youtube.com/watch?v=3amqlQFR_V8&list=PLLF4kBvOHH6-epjmlDqJXFKhXWjJtOENZ&index=31.

from the Texas Public Policy Foundation—well, I mean, not really; I never really go away, do I . . . ?”²⁰

B. *AFPI Annual Policy Summit in May 2025*

On May 21, 2025, Rollins appeared in her official capacity at AFPI’s Annual Policy Summit in Washington, D.C.²¹ On social media, AFPI tagged Rollins’s official government account, @SecRollins, where her profile describes her as “the 33rd U.S. Secretary of Agriculture under the leadership of @POTUS Trump.”²² In her publicly-available remarks, Rollins thanked AFPI members and summit attendees for their continued support, and commented on her surprise that she is now serving in the President’s Cabinet as Secretary of the USDA.²³

C. *AFPI Global Energy Summit in October 2025*

On October 22, 2025, Rollins appeared in her official capacity to speak at the AFPI Global Energy Summit in Washington, D.C. The event “conven[ed] top leaders, policymakers, entrepreneurs, and experts committed to restoring American energy dominance.”²⁴

Rollins’s panel, titled “The American Model for Energy and Environment,” included Department of Energy Secretary Chris Wright, and she was introduced as “Secretary of Agriculture Brooke Rollins.”²⁵ Although she was specifically asked about her “unique perspective at USDA”²⁶ and was appearing in her official capacity, Rollins referred to herself as a part of AFPI and discussed the organization’s role in shaping U.S. energy policy: “This is the importance of . . . organizations like America First and Texas Public Policy and others, that we really are at the front lines of not just playing offense, and we [gestures to Secretary Wright] are able to play offense now, which is amazing, but mounting the defense to allow us to move these issues forward.”²⁷ Rollins went on to discuss the role that the USDA Secretary plays in energy policy and the international focus of the administration’s agriculture policy.

²⁰ *Id.* at 4:39.

²¹ America First Policy Institute (@A1Policy), X (May 21, 2026, 8:16 PM), <https://x.com/A1Policy/status/1925345065699844487>.

²² *Id.*

²³ America First Policy Institute (@a1policy), Instagram (May 21, 2025), <https://www.instagram.com/reel/DJ70DpXNTLB/>.

²⁴ *America First Policy Institute Global Energy Summit*, Am. First Pol’y Inst. (Oct. 22, 2025), <https://www.americafirstpolicy.com/events/america-first-policy-institute-global-energy-summit>.

²⁵ *Id.* at 35:20.

²⁶ *Id.* at 38:21.

²⁷ *Id.* at 41:22.

D. *AFPI Fifth Annual America First Experience & Gala in November 2025*

In November 2025, Rollins made multiple appearances at the AFPI Fifth Annual America First Experience and Gala hosted at President Trump’s Mar-a-Lago estate in Palm Beach, Florida.²⁸ From November 19-21, 2025, Rollins made three separate appearances at the AFPI awards ceremony, American Dream Luncheon, and Gala.²⁹ Notably, Rollins and other members of President Trump’s Cabinet were identified as attendees at the AFPI Gala and referred to as “AFPI’s cabinet.” This reference included Rollins, Linda McMahon, Dr. Mehmet Oz, Doug Collins, Lori Chavez-DeRemer, and Tulsi Gabbard, “each sharing updates on the progress being made across President Trump’s administration.”³⁰

Rollins’s appearances at these events are in violation of the 5 C.F.R. § 2635.502 one-year recusal requirement in her ethics agreement. Each event constitutes a particular matter involving a specific party because they were hosted by a specific, identifiable organization (AFPI or TPPF), and Rollins participated personally and substantially in these particular matters through her appearances and speeches.

The recusal period mandated by the impartiality regulation and the ethics agreement are designed to prevent conduct where a reasonable person with knowledge of the relevant facts would question an official’s impartiality. Rollins’s appearances at the TPPF and AFPI events in 2025 show the importance of these recusal requirements. She used these appearances to tout her official role as USDA Secretary while emphasizing her continued affiliation with her former employers, raising serious questions about whether she can be impartial regarding particular matters involving these outside organizations.

Altogether, these speaking events risk the appearance of the loss of impartiality in the performance of Rollins’s official duties as Secretary of the USDA, a risk that the 5 C.F.R. § 2635.502 ethics agreement recusal language was specifically intended to prevent.

IV. Rollins May Have Received a Covered Payment from AFPI Requiring an Additional Recusal Period

In addition to possibly violating her ethics agreement by appearing at AFPI events throughout 2025, Rollins may have received a “covered payment” from AFPI prior to entering government service, thereby subjecting her to an additional two-year recusal requirement. A covered payment received from a former employer prior

²⁸ *Fifth Ann. Am. First Experience & Gala*, AFPI (last visited Apr. 23, 2026), <https://www.americafirstpolicy.com/events/fifth-annual-america-first-experience-gala>.

²⁹ *Id.*

³⁰ *Id.*

to beginning government service raises a legitimate appearance concern that the federal employee may not act impartially in particular matters to which the former employer is a party or represents a party.³¹

Federal employees must recuse from particular matters involving specific parties in which the employee's former employer is a party or represents a party if the employee received a covered payment from their former employer.³² A covered payment is any item with a value of more than \$10,000 that is paid "[o]n the basis of a determination made after it became known to the former employer that the individual was being considered for or had accepted a government position."³³ If such a covered payment was received, then the recusal is in place for a period of two years from the date of payment.³⁴

In this case, Rollins received additional income from AFPI in late 2024 and early 2025 that may constitute covered payments requiring a two-year recusal period. *First*, Rollins received a \$300,000 bonus from AFPI in late 2024, as reported in AFPI's 2024 tax filings.³⁵ This \$300,000 bonus was a significant departure from Rollins's previous bonuses of \$50,000 in 2023 and 2022,³⁶ and no other AFPI employees were awarded a similar amount. *Second*, Rollins reported an additional \$240,000 in income from AFPI on her public financial disclosure form filed on January 8, 2025,³⁷ which is not accounted for in her 2024 salary or bonus from AFPI.

The timing of both of these substantial payments suggests that Rollins was awarded additional income after AFPI became aware of Rollins's consideration for her government position. The official announcement of her nomination occurred on November 23, 2024,³⁸ and reporting suggests Rollins was in discussions to join the administration for weeks prior.³⁹ The OIG should therefore investigate if Rollins

³¹ 56 Fed. Reg. 33778, 33786 (July 23, 1991).

³² 5 C.F.R. § 2635.503(a).

³³ *Id.* § (b)(1)(i).

³⁴ *Id.* § 2635.503(a).

³⁵ America First Policy Institute, Form 990, Schedule J 2024.

³⁶ America First Policy Institute, Form 990, Schedule J 2023; America First Policy Institute, Form 990, Schedule J 2022.

³⁷ Public Financial Disclosure Report for Brooke Rollins, *supra* note 12, at Part 2.

³⁸ Statement by President-elect Donald J. Trump, *supra* note 11.

³⁹ See Meredith Lee Hill and Meridith McGraw, *Trump taps loyalist Rollins for USDA chief in surprise pick*, Politico (Nov. 23, 2025), <https://www.politico.com/news/2024/11/23/trump-loyalist-brooke-rollins-usda-secretary-surprise-nomination-0019139> ("Rollins had also been in the early running to be Trump's chief of staff, but he ultimately tapped Susie Wiles.")

received covered payments from AFPI prior to entering government service, thereby subjecting her to a two-year recusal requirement under 5 C.F.R. § 2635.503.⁴⁰

V. Rollins May Not Have Fully Resigned from Her Positions with Outside Organizations and Former Clients Since Entering Office

Finally, the OIG should investigate if Rollins fully resigned from her positions with outside organizations and former clients since entering government service. Rollins promised in her ethics agreement that she would resign from her positions with former employers TPPF and AFW upon confirmation.⁴¹ Further, Rollins agreed to recuse from any particular matter involving specific parties in which former clients of Rollins’s consulting firm, BLR Ideas, Corp., is a party or represents a party “for a period of one year after [Rollins] last provided service to that client or until the client satisfies any outstanding bill[.]”⁴² These former clients include TPPF and the Mouradian Foundation.⁴³ Despite these promises, Rollins appears to have maintained her outside positions with these organizations and former clients since entering office. Rollins’s failure to resign from these outside positions could be considered a violation of her ethics agreement, 5 C.F.R. § 2635.502, and false statements on her Ethics Agreement Compliance Certification under 18 U.S.C. § 1001.

A. TPPF – Senior Advisor and Former Client

Rollins appears to have retained her outside position with TPPF in violation of her ethics agreement and Ethics Agreement Compliance Certification. Rollins agreed to resign from her Senior Advisor role with TPPF upon confirmation and to recuse from particular matters involving specific parties in which TPPF, as a former client of BLR Ideas Corp., is a party or represents a party.⁴⁴

Despite this language in her ethics agreement, and claiming to have completed her resignation from TPPF by February 18, 2025,⁴⁵ Rollins continues to be featured on TPPF’s website as a Senior Advisor, and her biography on the TPPF website provides links to request Rollins to speak or interview on behalf of TPPF.⁴⁶ Additionally, Rollins has maintained close ties with TPPF since entering office: as

⁴⁰ This potential extended recusal requirement is already relevant; Rollins appeared at the April 9, 2026, Keynote Lunch hosted by TPPF. *Keynote Lunch with U.S. Sec’y of Agric. Brooke Rollins*, TPPF, (Apr. 9, 2026), <https://www.texaspolicy.com/multimedia/article/keynote-lunch-with-united-states-secretary-of-agriculture-brooke-rollins>.

⁴¹ Brooke Rollins Ethics Agreement, *supra* note 1, at Section 2.

⁴² *Id.* at Section 3.

⁴³ Public Financial Disclosure Report for Brooke Rollins, *supra* note 12, at Part 4.

⁴⁴ Brooke Rollins Ethics Agreement, *supra* note 1, at Section 3.

⁴⁵ Brooke Rollins Ethics Agreement Compliance Certification, *supra* note 16.

⁴⁶ *Brooke Rollins*, TPPF, (last visited Apr. 23, 2026), <https://www.texaspolicy.com/about/people/brooke-rollins/>.

noted above, Rollins made a personal appearance at a TPPF-hosted event just a few days after her confirmation hearing as Secretary of the USDA.⁴⁷

B. The Mouradian Foundation – Former Client, Speaker

Rollins disclosed the Mouradian Foundation as a former client of her consulting firm, BLR Ideas, Corp., on her public financial disclosure form.⁴⁸ As with all clients of BLR Ideas, Corp., Rollins promised to recuse from particular matters involving specific parties in which her former client is a party or represents a party for one year after she last provided services.⁴⁹ Nonetheless, Rollins continues to be featured on the Mouradian Foundation website as a speaker,⁵⁰ which suggests that Rollins has continued to provide services to the Mouradian Foundation since her confirmation as Secretary of the USDA.

C. AFW – Board Member

Rollins’s ethics agreement, signed on January 14, 2025, provided that she would resign from her board member position with AFW upon confirmation. Rollins confirmed in her Ethics Agreement Compliance Certification, signed February 18, 2025, that she had completed “all of the resignations indicated in my ethics agreement before I assumed the duties of my current government position.”⁵¹ However, Rollins continues to be listed on AFW’s website as an “emeritus board member,”⁵² which suggests that Rollins has not fully resigned from her senior role and maintains some responsibilities within the organization.

The USDA OIG should review Rollins’s continued affiliations with these outside organizations and determine if she has participated in any particular matters involving specific parties in which any of these entities is a party or represents a party. In particular, the USDA OIG should investigate if Rollins has fully resigned from her roles with these outside organizations and determine why Rollins continues to be featured on the organizations’ public websites. Failure to fully and properly resign from these outside positions could constitute a violation of Rollins’s ethics agreement, 5 C.F.R. § 2635.502, and 18 U.S.C. § 1001.

VI. Conclusion

The foregoing facts establish a possible violation of Rollins’s ethics agreement, federal ethics regulations, and 18 U.S.C. § 1001. An OIG investigation is

⁴⁷ Tex. Pol’y Summit 2025 – Sec’y Brooke Rollins, *supra* note 19.

⁴⁸ Public Financial Disclosure Report for Brooke Rollins, *supra* note 12, at Part 4.

⁴⁹ Brooke Rollins Ethics Agreement, *supra* note 1.

⁵⁰ *Speakers*, Mouradian Found., (last visited Apr. 23, 2026), <https://www.mouradianfoundation.com/speakers.html>.

⁵¹ Brooke Rollins Ethics Agreement Compliance Certification, *supra* note 16.

⁵² *AFW Leadership*, AFW, (last visited Apr. 23, 2026), <https://americafirstworks.com/leadership/>.

needed to determine if these appearances were made without authorization and whether Rollins violated other ethics laws while serving in her government position. Further investigation is needed to determine if Rollins received a covered payment from her former employer prior to entering government service. Additionally, further investigation is needed to determine if Rollins fully and properly resigned from her outside positions since entering office.

Respectfully submitted,

_____/s/_____
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