

January 15, 2025

President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Trump:

Ensuring transparency and ethical leadership is a critical component to restoring the public's trust in their government and making sure that public servants are working in the public interest. As organizations working across the political spectrum to strengthen ethics and accountability, we encourage you to build on the ethics executive order you issued during your first administration—which included a number of strong provisions—and issue a day-one executive order making clear your commitments to ethics.

In particular, a robust executive order should build on best practices from previous presidential ethics executive orders, and include the following provisions:

1. Five-year post-government employment ban on lobbying as a registered lobbyist for all appointees who are former senior and very senior officials;
2. Two-year post-government employment ban on communicating with the appointee's former agency and senior White House staff on behalf of others with intent to influence, for all former senior and very senior officials;
3. Two-year post-government employment ban for all appointees who are former senior or very senior officials on behind-the-scenes assistance to lobbyists;
4. Five-year post-government employment ban for all appointees on working for any foreign government or foreign political party to influence U.S. policy;
5. Ban on appointees accepting gifts from lobbyists, lobbying organizations, and any for-profit corporation that is a client of a registered lobbyist;
6. Ban on appointees handling matters involving former employers or clients within the previous two years;
7. Ban on handling matters on which the appointee had lobbied within the previous two years;
8. Ban on former lobbyists being appointed to an agency within the administration that they had lobbied within the previous two years;
9. Prohibition on “golden parachute payments” in cash or in kind (if offered as a direct substitute for a cash payment), whether given before or after entering government, unless the appointees can show they would have received it if they had not entered the United States government;

10. Hiring based on qualifications, competence, and experience;
11. Require training on merit system principles and whistleblower protection;
12. Public disclosure of all ethics pledges, ethics agreements, and waivers within ten days in a centralized database on the Office of Government Ethics' (OGE) website;
13. Require OGE to issue a report to the president and the public on the administration of all ethics executive orders and a variety of laws and regulations pertaining to ethics;
14. Define executive agency to include the Executive Office of the President, United States Postal Service, United States Postal Regulatory Commission, but not the Government Accountability Office;
15. Require agency heads, in consultation with the Designated Agency Ethics Official (DEAO) and OGE, to establish and publish rules to ensure pledges are signed, ensure compliance with waivers in written ethics agreements, and ensure that spousal employment issues and other conflicts are addressed in written ethics agreements;
16. Bar retroactive waivers;
17. Require written justifications for why a waiver is in the national interest, and post them on OGE's website within ten days;
18. Prohibit receiving post-government compensation from a contractor who the former official awarded contracts in excess of \$10 million for two years after public service;
19. Restrict all senior and very senior employees from holding investments and stocks (including their spouses and dependent children) other than in treasuries, diversified mutual funds and similar non-conflicting assets;
20. Bar all senior and very senior employees from engaging in compensated outside employment for the duration of their appointment, with limited exceptions for family trusts;
21. Establish clear conflicts of interest rules and procedures for special government employees and officially-designated contractors;
22. Provide that all senior and very senior employees must disclose the holdings of discretionary trusts to the same extent that they would disclose the holdings of trusts for which they are vested beneficiaries;
23. Provide that OGE must review and certify the financial disclosure reports and ethics agreements of any agency heads whose positions do not require Senate confirmation (e.g., CDC Director, Postmaster General, etc.) before they begin serving in the administration; and
24. Appoint an ethics czar or comparable ethics officer responsible for overseeing implementation of the ethics rules, which would include training employees, providing advice and enforcing the ethics rules.

We appreciate you giving these important ethics provisions your consideration and look forward to working with you to help build a government the American public can trust. If you have any questions or wish to discuss further, please contact Craig Holman at cholman@citizen.org.

Sincerely,

Project on Government Oversight

Issue One

Public Citizen

Transparency International U.S.