

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

July 28, 2022

The Honorable Mark Greenblatt
Inspector General
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C., 20240

Dear Inspector General Greenblatt,

Elected officials' financial disclosures play an essential role in preventing conflicts of interest.¹ Annual disclosures serve as a tool to monitor potential conflicts throughout an elected official's tenure.² Disclosures, however, are only as effective as the accuracy of the information provided. Last week, the completeness of Secretary Haaland's disclosures were again called into question.³ In addition to raising concerns about Secretary Haaland's compliance with federal ethics standards, this complaint triggers additional questions about the operation of the Department of the Interior's (DOI) Departmental Ethics Office (DEO). Therefore, I am reiterating my January 24, 2022, request⁴ that the Office of Inspector General (OIG) audit the DEO to assess its efficacy and effectiveness in fostering an ethical environment at DOI.

In a July 20, 2022, complaint to your office, a government watchdog group noted the peculiarity of Secretary Haaland's financial disclosure reports.⁵ Specifically, the group highlighted that despite the requirement to report interests in real property and bank accounts with more than \$5,000.00, Secretary Haaland's initial Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278) only reported a "Tribal annual per capita payment" of \$175.00 for the entirety of her "Assets and Income."⁶ Based on her prior employment as a member of the U.S. House of Representatives from which she received an

¹ Dave Apol, U.S. OFFICE OF GOV'T ETHICS, *The Annual Public Financial Disclosure System: The Ongoing Work of Preventing Conflicts of Interest*, (May 16, 2022),

<https://www.oge.gov/web/oge.nsf/News+Releases/33CA505BD2E1A5AF8525884400469D2F?opendocument>.

² *Id.*

³ Complaint for Protect the Public's Trust, Request for Investigation into Apparent Reporting Violations by U.S. Secretary of the Interior Debra Haaland (July 20, 2022), *see also* Press Release, PROTECT THE PUBLIC'S TRUST, *Watchdog to Investigate Interior Sec'y Haaland's Wedding for Possible Improper Gifts*, (Sept. 3, 2021), <https://protectpublicstrust.org/in-the-news/watchdog-to-investigate-interior-secretary-haalands-wedding-for-possible-improper-gifts/>.

⁴ Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res, to The Honorable Mark Greenblatt, Inspector General, Dep't of the Interior (Jan.24, 2022) (on file with Comm.).

⁵ Complaint for Protect the Public's Trust, Request for Investigation into Apparent Reporting Violations by U.S. Secretary of the Interior Debra Haaland (July 20, 2022).

⁶ EXEC. BRANCH PERSONNEL PUBLIC FINANCIAL DISCLOSURE REPORT (OGE FORM 278E) FOR DEBRA HAALAND (2021).

annual salary of \$174,000.00, the absence of a reportable bank account,⁷ while not impossible, appears improbable.

Subsequent to her August 2021 marriage, Secretary Haaland filed another OGE Form 278 detailing numerous spousal assets.⁸ In addition to questioning whether Secretary Haaland properly reported all her assets,⁹ the watchdog group's complaint raises serious concerns about the steps taken by the DEO to verify the information provided to them.

This example is illustrative of larger questions regarding the processes in place at the DEO. Over the past thirteen months, Republicans on the House Natural Resources Committee repeatedly raised questions about the compliance of several political appointees with their ethical obligations.¹⁰ My January 24, 2022, letter detailed specific examples where the DEO's reliance

⁷ *Id.*

⁸ EXEC. BRANCH PERSONNEL PUBLIC FINANCIAL DISCLOSURE REPORT (OGE FORM 278E) FOR DEBRA HAALAND (2022).

⁹ Complaint for Protect the Public's Trust, Request for Investigation into Apparent Reporting Violations by U.S. Secretary of the Interior Debra Haaland (July 20, 2022).

¹⁰ See Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., Rep. Paul Gosar, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., and Rep. Lauren Boebert, to Ms. Elizabeth Klein, Senior Counselor to the Sec'y, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (June 3, 2021) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res. and Rep. Paul Gosar, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., to Ms. Nada Culver, Dep'y Dir., Policy and Programs, Bureau of Land Mgmt., U.S. Dep't of the Interior and Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (June 15, 2021) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., Rep. Paul Gosar, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., and Rep. Lauren Boebert, to Ms. Elizabeth Klein, Senior Counselor to the Sec'y, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (June 22, 2021) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res. and Rep. Paul Gosar, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., to Hon. Tommy Beaudreau, Deputy Sec'y, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (June 28, 2021) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res. and Rep. Paul Gosar, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., to Mr. Daniel Cordalis, Deputy Solicitor, Water Resources, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (July 20, 2021) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., to Ms. Rose Petoskey, Senior Counselor to the Ass't Sec'y, Bureau of Indian Affairs, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (Jan. 19, 2022) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., to Ms. Stephanie Sfiridis, Senior Counselor to the Ass't Sec'y, Bureau of Indian Affairs, U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (Jan. 19, 2022) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., to The Honorable Tracy Stone-Manning, Dir., Bureau of Land Mgmt., U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (Jan. 20, 2022) (on file with Comm.); Letter from Rep. Bruce Westerman, Ranking Member, H. Comm. on Nat. Res., Rep. Blake Moore, Ranking Member, Subcomm. on Oversight and Investigations, H. Comm. on Nat. Res., and Rep. Pete Stauber, Ranking Member, Subcomm. on Energy and Mineral Res., H. Comm. on Nat. Res., to Ms. Janea Scott, Counselor to the Ass't Sec'y for Lands and Minerals Mgmt., U.S. Dep't of the Interior and Ms. Heather Gottry, Dir. and Designated Agency Ethics Official, Departmental Ethics Office, U.S. Dep't of the Interior (May 3, 2022) (on file with Comm.).

on information provided by political appointees, including Elizabeth Klein, Nada Culver, and Daniel Cordalis, called into question whether these officials were operating under accurate ethics guidance.¹¹ The concerns surrounding Secretary Haaland's initial OGE Form 278 raise similar questions about the DEO's ability to receive accurate conflicts of interest and financial disclosure forms due to the sole dependence on political appointees-reported information.

Absent a deeper review and increased transparency into the DEO's processes for verification, confidence in an effective DOI ethics compliance program is compromised. Therefore, I urge you to act on my January 24, 2022, request to audit the DEO and examine the following questions:

1. What is DEO's process for creating ethics compliance materials including, but not limited to, Ethics Guidance on Recusal Obligations and Ethics Recusal and Screening Arrangements?
2. Are ethics agreements for political appointees being created in a timely manner?
3. How does the DEO collect information from political appointees?
4. Does the DEO have procedures in place to verify the information provided to them by political appointees?
5. Are political appointees complying with their ethical obligations?

Please contact the House Committee on Natural Resources Minority staff at HNRR.Oversight@mail.house.gov with any questions about this request.

Thank you for your prompt attention to these matters and I look forward to the outcome of your audit.

Sincerely,



Bruce Westerman
Ranking Member
Committee on Natural Resources

¹¹ *Supra* note 4.