

U.S. House of Representatives

Committee on Natural Resources

Washington, DC 20515

June 5, 2023

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Ms. Heather Gottry
Director and Designated Agency Ethics Official
Departmental Ethics Office
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Haaland and Ms. Gottry:

As you are aware, Federal agencies are responsible for fostering cultures of ethical conduct.¹ Employees unable to act impartially are not qualified to perform their role in government.² To ensure appropriate conduct, the U.S. Office of Government Ethics (“OGE”) issues ethical standards by which all executive branch employees must abide.³ OGE standards require employees to “place loyalty to the Constitution, the laws, and ethical principles above private gain”⁴ and to “act impartially.”⁵ Executive branch employees must also “not give preferential treatment to any private organization or individual.”⁶ Transparency is key to ensuring compliance with OGE’s standards.⁷ Under the standards of ethical conduct, federal government officials are required to recuse from particular matters involving specific parties where “a person with whom he has a covered relationship is or represents a party to such matter,” unless authorized by the agency to participate.⁸

¹ *Nomination of Emory A. Rounds III Nominated to be Director of U.S. Office of Government Ethics, Kelly A. Higashi Nominated to be an Associate Judge, Superior Court for the District of Columbia, and Frederick M. Nutt Nominated to be Controller, Officer of Federal Financial Management, Office of Management and Budget: Hearing before the S. Comm. on Homeland Security and Governmental Affairs, 115th Cong. (2018) (statement of Emory A. Rounds III, nominated to be Director of U.S. Office of Gove’t Ethics).*

² *Id.*

³ 5 C.F.R. Part 2635.

⁴ 5 C.F.R. § 2635.101(b)(1).

⁵ 5 C.F.R. § 2635.101(b)(8).

⁶ *Id.*

⁷ U.S. OFFICE OF GOV’T ETHICS, *The Ethics Program, Transparency, and You* (June 7, 2018), <https://www.oge.gov/web/oge.nsf/Resources/The+Ethics+Program,+Transparency,+and+You>.

⁸ 5 C.F.R. § 2635.502(a).

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Furthermore, a federal government official is barred from using their position for the private gain of family members or nonprofit organizations.⁹ Likewise, a federal government official should not use or “permit the use” of their position, title, or authority associated with their office “in a manner that could reasonably be construed to imply” that their agency or the federal government supports the activities of an individual or organization.¹⁰

In addition to federal ethical rules and standards, Biden Administration appointees are also subject to Executive Order 13989 (the “President Biden Ethics Pledge”). The President Biden Ethics Pledge requires Biden Administration appointees to sign an ethics pledge, which, among other commitments, expands the scope of the recusal obligations.¹¹ Beyond these requirements, appointees are also required to file a public financial disclosure report with the Office of Government Ethics, (“OGE-278”), which requires disclosure of financial and other potential conflicts of interest.¹²

Prior to joining the Biden Administration as Secretary of the Department of the Interior, Secretary Haaland was evidently involved with the Pueblo Action Alliance (“PAA”),¹³ a New Mexico based environmental and social justice organization that frequently engages in advocacy, protests, and lobbying throughout the United States.¹⁴ PAA and its leaders advocate for the dismantling of America’s economic and political system and believe America is irredeemable because there is no “opportunity to reform a system that isn’t founded on good morals or values.”¹⁵ PAA’s work includes efforts to restrict domestic oil and gas production.¹⁶ Secretary Haaland has purportedly met with PAA leaders during her time as Secretary of the Interior to discuss PAA’s opposition to oil and gas production on federal lands.¹⁷ The Department of the Interior is responsible for managing oil and gas production on federal lands.¹⁸

⁹ 5 C.F.R. § 2635.702.

¹⁰ 5 C.F.R. § 2635.702(b)

¹¹ See Executive Order 13989 §§ 1(2), 2(j), (k), (m) (Jan. 25, 2021),

<https://www.federalregister.gov/documents/2021/01/25/2021-01762/ethics-commitments-by-executive-branch-personnel>.

¹² U.S. OFFICE OF GOV’T ETHICS, *Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)*, 5 C.F.R. part 2634 (updated Nov. 2021),

[https://www.oge.gov/web/OGE.nsf/OGE%20Forms/FE904FADB163B45A852585B6005A23E8/\\$FILE/OGE%20Form%20278e%20\(Nov%202021%20508%20PDF%20version\).pdf?open](https://www.oge.gov/web/OGE.nsf/OGE%20Forms/FE904FADB163B45A852585B6005A23E8/$FILE/OGE%20Form%20278e%20(Nov%202021%20508%20PDF%20version).pdf?open).

¹³ PUEBLO ACTION ALLIANCE, *Secretary of the Department of the Interior: Official Statement from Pueblo Action Alliance on Representative Deb Haaland’s Nomination* (Mar. 15, 2021),

<https://www.puebloactionalliance.org/blog/secretary-of-the-department-of-the-interior-official-statement-from-pueblo-action-alliance-on-the-vote-to-confirm-deb-haalands-nomination>.

¹⁴ See generally PUEBLO ACTION ALLIANCE, <https://www.puebloactionalliance.org/> (last visited May 3, 2023).

¹⁵ *Hot and Dry Podcast: Water Back & Pueblo Action Alliance* (Sep. 13, 2021),

<https://podcasts.apple.com/us/podcast/water-back-the-pueblo-action-alliance/id1449804910?i=1000535198752>.

¹⁶ PUEBLO ACTION ALLIANCE, *supra* note 13; see also Julia Bernal, *Capitalist Solutions WON’T Solve Climate Change: Carbon Pricing is a FALSE solution and not for NM*, PUEBLO ACTION ALLIANCE (July 7, 2021),

<https://www.puebloactionalliance.org/blog/capitalist-solutions-wont-solve-climate-change-carbon-pricing-is-a-false-solution-and-not-for-nm>.

¹⁷ *Hot and Dry Podcast*, *supra* note 15

¹⁸ See *Department of the Interior*, LATHAM & WATKINS, <https://www.lw.com/en/weve-got-washington-covered/department-of-interior> (last visited May 3, 2023).

It is reported that Secretary Haaland's daughter, Somah Haaland ("Somah"), has been employed by PAA since at least 2020.¹⁹ In 2022, Somah was involved in a PAA trip to Capitol Hill to "lobby members of Congress" on legislation that would prohibit lease sales for oil and gas development on federal land.²⁰ Earlier this year, Somah represented PAA at a *People vs. Fossil Fuels* rally and declared "we all need to work together to stop oil and gas developments."²¹

Additionally, Secretary Haaland's latest annual public financial disclosure report indicates that her husband, Skip Sayre, consults for the Laguna Development Corporation.²² Skip Sayre was previously employed in a leadership sales and marketing role for the Laguna Development Corporation.²³ The Laguna Development Corporation is the "business arm" for the Pueblo of Laguna.²⁴ The Pueblo of Laguna is a federally recognized tribal entity that is eligible to receive funding and services from the Bureau of Indian Affairs.²⁵ The Bureau of Indian Affairs is a federal agency within the Department of the Interior.²⁶

The House Committee on Natural Resources (the "Committee") is concerned with Secretary Haaland's compliance with ethical obligations and potential conflicts of interest given PAA's opposition to oil and gas production on federal lands, Secretary Haaland's involvement with PAA, Somah's work with PAA to limit domestic energy production, and the work of Secretary Haaland's husband, Skip Sayre, for a federally recognized tribal entity.

To honor Secretary Haaland's ethical obligations and assist with the Committee's oversight activities, please provide the Committee with the following documents as soon as possible, but no later than 5:00 p.m. on June 26, 2023:

1. A copy of all ethics pledges signed by Secretary Haaland, including, but not limited to, the President Biden Ethics Pledge.

¹⁹ Kate Mazade, *Somah Haaland: 'We Have a Lot to Say'*, AMERICAN THEATER (July 6, 2020), <https://www.americantheatre.org/2020/07/06/somah-haaland-we-have-a-lot-to-say/>.

²⁰ Press Release, WILDEARTH GUARDIANS, *Greater Chaco advocates travel from New Mexico to call on congress for environmental justice for Greater Chaco* (Dec. 15, 2022), <https://wildearthguardians.org/press-releases/greater-chaco-advocates-travel-dc/>.

²¹ @Tim400000, TWITTER, (Jan. 20, 2023, 6:23 PM), <https://twitter.com/Tim400000/status/1616577221392584704>.

²² Debra A. Haaland, *Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)*, U.S. OFFICE OF GOV'T ETHICS, 5 C.F.R. Part 2634 (May 24, 2022), [https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/50E0AC10459338938525884C002EC3EE/\\$FILE/Debra-A-Haaland-2022-278.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/50E0AC10459338938525884C002EC3EE/$FILE/Debra-A-Haaland-2022-278.pdf).

²³ Charles D. Brunt, *Proposed Navajo Nation gaming compact raises concerns*, ALBUQUERQUE JOURNAL (Dec. 8, 2013), <https://www.abqjournal.com/316241/navajo-gaming-compact-plan-raises-concerns.html>.

²⁴ Deborah Baker, *Dems choose Haaland as state party chair*, ALBUQUERQUE JOURNAL (Apr. 25, 2015), <https://www.abqjournal.com/575074/dems-choose-haaland-as-state-party-chair.html>.

²⁵ BUREAU OF INDIAN AFFAIRS, *Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs*, 86 Fed. Reg. 7554 (Jan. 29, 2021), <https://www.federalregister.gov/documents/2021/01/29/2021-01606/indian-entities-recognized-by-and-eligible-to-receive-services-from-the-united-states-bureau-of>.

²⁶ See U.S. DEPARTMENT OF THE INTERIOR, *Bureau of Indian Affairs (BIA)*, <https://www.bia.gov/bia> (last visited May 3, 2023).

2. A copy of Secretary Haaland's Ethics Guidance and Recusal Obligations and all related attachments, including, but not limited to, her List of Recusals and Quick Reference Chart.
3. Documents and communications sufficient to describe all ethics waivers granted to Secretary Haaland.
4. All documents and communications between Secretary Haaland and Somah Haaland, from March 16, 2021 to the present, regarding any of the following individuals, topics, and organizations:
 - a. Oil, gas, and mineral leasing on federal lands;
 - b. Pueblo Action Alliance;
 - c. Officers, directors, or members of the Pueblo Action Alliance, including, but not limited to, Julia Bernal;
 - d. Laguna Development Corporation;
 - e. The Pueblo of Laguna;
 - f. The *People vs. Fossil Fuels* protest that occurred in Washington, D.C. from October 11, 2021 to October 15, 2021;
 - g. The withdrawal of federal lands from oil, gas, and mineral leasing; and
 - h. Efforts to influence Members of Congress and/or government officials on withdrawing federal lands from oil, gas, and mineral leasing.
5. All documents and communications between Secretary Haaland and her husband, Skip Sayre, from March 16, 2021 to the present, regarding any of the following individuals, topics, and organizations:
 - a. Oil, gas, and mineral leasing on federal lands;
 - b. Pueblo Action Alliance;
 - c. Officers, directors, or members of the Pueblo Action Alliance, including, but not limited to, Julia Bernal;
 - d. Laguna Development Corporation;
 - e. The Pueblo of Laguna;
 - f. The *People vs. Fossil Fuels* protest that occurred in Washington, D.C. from October 11, 2021 to October 15, 2021;
 - g. The withdrawal of federal lands from oil, gas, and mineral leasing; and
 - h. Efforts to influence Members of Congress and/or government officials on withdrawing federal lands from oil, gas, and mineral leasing.
6. All documents and communications regarding Skip Sayre's work, whether as an employee or a consultant, for the Laguna Development Corporation, Pueblo of Laguna, or any federally recognized tribe, tribal entity, or tribal organization, from March 16, 2021, to the present.

7. All documents and communications regarding disclosures Secretary Haaland has made to the Department of the Interior ethics officials regarding Somah Haaland's connections to PAA and other activist groups.
8. All documents and communications regarding disclosures Secretary Haaland has made to the Department of the Interior ethics officials regarding Skip Sayre's work, past and present, and whether as an employee or consultant, for the Laguna Development Corporation.

An attachment to this letter provides additional instructions for responding to the requests from the Committee on Natural Resources. Please contact the Majority staff for the Oversight and Investigations Subcommittee at (202) 225-2761 or HNRR.Oversight@mail.house.gov with any questions. Under House Rule X, the Committee on Natural Resources has "general oversight" of any matter relating to its jurisdiction, including tribal affairs and the management of America's natural resources.

Sincerely,



Bruce Westerman
Chairman
Committee on Natural Resources



Paul A. Gosar, D.D.S.
Chairman
Subcommittee on Oversight and Investigations



Doug LaMalfa
Member of Congress



Russ Fulcher
Member of Congress



Pete Stauber
Member of Congress



Cliff Bentz
Member of Congress

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Lauren Boebert
Member of Congress



Jerry Carl
Member of Congress



John Duarte
Member of Congress



Harriet Hageman
Member of Congress



Anna Paulina Luna
Member of Congress

cc: The Honorable Raúl Grijalva, Ranking Member, House Committee on Natural Resources
The Honorable Melanie Stansbury, Ranking Member, Subcommittee on Oversight and
Investigations

Enclosure