



PROTECT the PUBLIC'S TRUST

VIA ELECTRONIC MAIL

July 20, 2022

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

Ms. Heather Gottry
Designated Agency Ethics Official
U.S. Department of the Interior
1849 C St., N.W.
Washington, D.C. 20240

The Honorable Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Ave., N.W.
Suite 500
Washington, D.C. 2005

Re: Request for Investigation into Apparent Reporting Violations by U.S. Secretary of the Interior Debra Haaland

Dear Mr. Greenblatt,

Protect the Public's Trust (PPT) is a nonpartisan organization dedicated to promoting ethics in government and restoring the public's trust in government officials.

Part of our mission is to ensure the public's trust is not weakened when senior public officials attempt to inappropriately maneuver around their financial transparency obligations or deceive the public about their true and complete financial interests. In light of multiple public filings by U.S. Secretary of the Interior Debra Haaland providing scant information about her actual net worth prior to her marriage last August, we believe the circumstances warrant a deeper review of whether assets ostensibly relied on to support Secretary Haaland were all properly disclosed. Thus, we respectfully request that you investigate whether Secretary Haaland properly reported her assets on her Nominee Public Financial Disclosure Report (OGE Form 278e).

On December 23, 2020, Secretary Haaland signed a Form 278e that reported no assets, including personal bank accounts or investment accounts, save an annual payment from



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the Pueblo of Laguna, New Mexico, in the amount of \$175 per year. While not strictly impossible, this report strains credulity. From January 2019 through January 2021, Secretary Haaland served in the United States House of Representatives, earning \$174,000 per year. Further, Secretary Haaland was gainfully employed prior to becoming a member of the U.S. House of Representatives. It is thus unlikely that she did not have at least one bank account with \$5,000 or more.

I. Background

In November 2018, Secretary Haaland was elected to the United States House of Representatives from New Mexico and began serving in January 2019. As a member of the United States House of Representatives, Secretary Haaland was paid \$174,000 per year.

Prior to joining the Department of the Interior, on December 23, 2020, then-Congresswoman Haaland signed an Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e) that reported *no* assets except for a tribal annual per capita payment of \$175 from the Pueblo of Laguna, New Mexico.

On May 11, 2022, Secretary Haaland submitted her next Form 278e. In addition to spousal employment assets and retirement accounts, this report disclosed two brokerage accounts. Endnotes on the report indicate that at least one of these brokerage accounts belonged to her husband, whom she married in 2021.

II. The Law

Persons nominated to the position of Secretary of the Interior and incumbent Secretaries are required to file a public financial disclosure report. *See* 5 U.S.C. app. §§ 101(b), (c), & (f); 5 C.F.R. §§ 2634.201(c) & 2634.202(c). As part of this report, public filers must disclose their interest in several types of reportable property, including real estate; stocks, bonds, and mutual funds; pensions and annuities; vested beneficial interests in trusts; ownership interests in businesses or partnerships; accounts receivable; and deposits in banks or other financial institutions. *See* 5 U.S.C. app. § 102; 5 C.F.R. § 2634.301(b). With respect to personal savings accounts, public filers do not need to report holdings in a single account that aggregates less than \$5,000. *See* 5 U.S.C. app. § 102(a)(3); 5 C.F.R. § 2634.301(c)(2).

III. Analysis

Pursuant to the relevant disclosure rules, Secretary Haaland would need to report interests in real property, as well as any bank account with more than \$5,000 on her OGE Form 278e. For the two years prior to becoming Secretary, Secretary Haaland served as a member of the House of Representatives with an annual salary of \$174,000. Secretary Haaland was also gainfully employed prior to becoming a Congresswoman.



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Even after taxes and assuming a generous investment in a government-sponsored retirement plan, which does not need to be reported on a Form 278, it strains credulity that Secretary Haaland did not have *any* bank or investment account with \$5,000 or more at the end of the relevant reporting period. Are we to believe that Secretary Haaland was cashing all of her paychecks and storing her savings under her mattress? Did she not have an account for her employer to use for direct deposit of her paychecks, especially considering many government entities require the use of direct deposit? Was the absence of such an account the subject of conversation with and among ethics officials during her confirmation process? Given the modest requirement to list a generic U.S. financial institution and report within a broad range of amounts (e.g., \$5,000-\$15,000 or \$15,000-\$50,000), the ubiquity of obligatory direct deposit, and the amount of compensation she received during each pay period, is the American public truly expected to accept that the individual projected to lead an agency with 70,000 employees and a budget of more than \$17 billion did not herself maintain one of the most basic elements of financial responsibility?

These questions of whether Secretary Haaland properly reported all of her assets on her Form 278 deserve answers. At minimum, the public deserves to know whether Secretary Haaland had access to or was utilizing a bank account in the name of another to conduct her personal financial affairs, or whether Secretary Haaland's compensation was being applied to an unreported liability.

IV. Conclusion

Cabinet officials such as the Secretary of the Interior are granted tremendous statutory authority to execute the law, make policy, and spend billions of taxpayer funds. However, this trust is bestowed in exchange for a promise of full transparency – both to the U.S. Senate during the confirmation process and to the American public during their tenure. In other words, public service is a public trust.

Reporting requirements such as listing all liabilities and sources of income or assets provide the public with a fuller picture of the individual responsible for leading federal employees and charged with a broad policy portfolio. If this responsibility is evaded through sleights-of-hand or maneuvers intended to disguise an individual's true financial portfolio, the public's trust is undermined. This also sends a message to federal employees that senior officials believe they are above the law. This message can undermine not only public trust but respect for the law and ethical obligations.

If Secretary Haaland was drawing on a bank account in another's name without reporting it, that would be deeply disturbing. Yet believing that her Nominee Form 278 filing was fully representative of her financial assets and liabilities, especially in light of her recently filed 2022 Form 278, now appear suspect. Further, considering that successfully completing earlier financial disclosures required multiple revisions, despite her having a



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minimal quantity of items to report, it is not inconceivable that she may not have properly completed this disclosure. Secretary Haaland's mid-2021 marriage to her "long-time partner" (as he has been described in media reports) forced her to reveal real property she has occupied for years, massive bank accounts in her husband's name, and a net worth that is more fitting for a cabinet official with her experience and relationships. An investigation into whether Secretary Haaland's nominee financial disclosure was complete, accurate, and consistent with her legal and ethical obligations would go a long way toward clearing up a growing cloud over the Secretary's tenure.

For the foregoing reasons, we respectfully request that you investigate whether Secretary Haaland properly reported her assets on her Nominee OGE Form 278.

Sincerely,

Michael Chamberlain
Director
Protect the Public's Trust