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Corporate Capture at Commerce

How Industry Insiders Are Running the Department of Commerce

By Zach Everson and Douglas S. Pasternak

Executive summary

More than one in four senior Commerce Department officials appointed by President Donald Trump have apparent conflicts of interest, according to 112 financial disclosures reviewed by Public Citizen.

The Department of Commerce has the sweeping mission to “create the conditions for economic growth and opportunity for all communities” in the United States, meaning corporate capture of the department has a broad impact.¹ Its 13 bureaus oversee areas ranging from the oceans (National Oceanic and Atmospheric Administration) to promoting minority entrepreneurship (Minority Business Development Agency).² The Census Bureau has a pivotal role in preserving democratic representation, while the Patent and Trademark Office is at the forefront of the emerging law regarding artificial intelligence.³ Under Trump, the Commerce Department has taken an active role in artificial intelligence, implementing an American AI Exports Program and establishing a National AI Center and potentially having a role in evaluating AI models.⁴ The department regulates export controls, trade enforcement, economic data, intellectual property policy, and telecom policy.⁵ It also sits on the Committee on Foreign Investment in the United States.⁶

This report highlights some of the most egregious potential conflicts, starting at the top with Secretary Howard Lutnick, the billionaire former CEO of financial firm Cantor Fitzgerald. Lutnick has been widely perceived as the most conflicted Secretary of

¹ <https://www.commerce.gov/about>

² <https://www.commerce.gov/bureaus-and-offices/mbda>,
<https://www.commerce.gov/bureaus-and-offices>

³ <https://www.commerce.gov/bureaus-and-offices>, <https://www.census.gov/about/what.html>,

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<https://www.trade.gov/press-release/department-commerce-announces-american-ai-exports-program-implementation>, <https://www.trade.gov/national-ai-center>, <https://archive.is/4y3oz>

⁵ <https://www.commerce.gov/bureaus-and-offices>

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<https://home.treasury.gov/policy-issues/international/the-committee-on-foreign-investment-in-the-united-states-cfius/cfius-overview>

Commerce in the department's 123-year history.⁷ (Most recently, in April, he donated \$5 million to a PAC backing House Republicans just weeks after the Oversight Committee arranged to interview him about his connections to sex offender Jeffrey Epstein.⁸) Through his previous positions, Lutnick had ties to at least 800 businesses, according to the disclosure he filed as a nominee.⁹ While other Trump appointees at Commerce can't match that astounding volume, their conflicts are also real and detrimental to the country. The department's top export control official, for example, represented more than 50 companies and a foreign government before taking over the bureau that regulates them.

It is hardly new for the Commerce Department to have a pro-business bias or to feature revolving-door officials. But the Trump Commerce Department is unique in its active engagement in the economy to benefit particular companies, including those for whom its current officials once worked.

Lobbyists and corporate executives are now in positions that could benefit their former clients or employers. Corporate lawyers from firms with active Commerce regulatory practices are now helping to set those regulations. Defense and tech industry staffers are spinning around the revolving door.

Public Citizen reviewed the financial disclosures for about 110 senior officials appointed by President Donald Trump to the Commerce Department and identified 30 with significant conflicts.

The conflicts

The boss

Lutnick's business interests spanned financial services, real estate, cryptocurrency, artificial intelligence, technology, satellites, energy, gaming, and other fields that could be directly impacted by policy decisions at the Department of Commerce.¹⁰ From 2011 to 2024, while Lutnick was CEO at Cantor Fitzgerald, the company was hit with combined penalties of more than \$39 million for 11 separate enforcement actions by the Securities and Exchange Commission, Commodity Futures Trading Commission (CFTC), and the Financial Industry Regulatory Authority.¹¹

⁷ <https://www.commerce.gov/about/history>

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<https://www.nytimes.com/2026/05/22/us/politics/howard-lutnick-donation-house-republicans.html>

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<https://www.bloomberg.com/news/articles/2025-01-24/lutnick-discloses-800-firms-in-complex-billionaire-ethics-filing>

¹⁰

[https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/AC841CF0E3B5807A85258C1C00320D21/\\$FILE/Lutnick%2C%20Howard%20%20final278.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/AC841CF0E3B5807A85258C1C00320D21/$FILE/Lutnick%2C%20Howard%20%20final278.pdf),

<https://www.commerce.gov/bureaus-and-offices>

¹¹ https://violationtracker.goodjobsfirst.org/?company_op=starts&company=cantor+fitzgerald

Forbes estimates Lutnick and his family are worth \$7.3 billion.¹² He pledged to “sell all of my interests, my business interests, all of my assets, everything,” within 90 days of his February 18, 2025, U.S. Senate confirmation.¹³ He did not complete this transfer, however, until October 2025—four months after the deadline he committed to upholding.¹⁴ In addition, rather than divesting his financial stake in Cantor Fitzgerald into an independent blind trust, he sold his interest in the firm to trusts benefiting his four adult children—including his two sons who are now the chairman and executive vice chairman of Cantor Fitzgerald.¹⁵ Ethics experts have viewed this arrangement as woefully inadequate.¹⁶

During his tenure as Secretary of Commerce, Lutnick has engaged in actions that have a clear conflict with his family’s financial interests and appear to violate ethical norms for government employees. In his official capacity at Commerce, he has promoted the construction of artificial intelligence (AI) data centers, for instance.¹⁷ At the same time, his former company Newmark Group, Inc., where his son Kyle Lutnick is now on the board of directors, has facilitated more than \$25 billion in AI data- centers deals.¹⁸ As Secretary of Commerce, Lutnick also reportedly pressured United Arab Emirates officials to invest in U.S. data centers.¹⁹ In addition, in January 2026, the Department of Commerce entered into an agreement with USA Rare Earth, Inc. where the government

¹² <https://www.forbes.com/profile/howard-lutnick/>

¹³

<https://apnews.com/article/lutnick-trump-tariffs-commerce-trade-ffee741e10c1c483ab03c564d6cd907a>,

<https://www.foxbusiness.com/politics/trumps-billionaire-commerce-secretary-pick-vows-sell-all-his-business-interests-confirmed>, <https://www.congress.gov/nomination/119th-congress/11/9>,

¹⁴

<https://www.bloomberg.com/news/features/2026-03-18/tether-made-loan-to-lutnick-s-children-as-they-bought-his-assets>,

<https://www.timeanddate.com/date/dateadded.html?m1=02&d1=18&y1=2025&type=add&ay=&am=&aw=&ad=90&rec=>,

<https://www.timeanddate.com/date/durationresult.html?m1=5&d1=19&y1=2025&m2=10&d2=06&y2=2025>,

¹⁵

<https://www.cantor.com/howard-lutnick-confirmed-as-41st-united-states-secretary-of-commerce-steps-down-from-his-positions-at-cantor-fitzgerald-l-p/>,

<https://www.cantor.com/cantor-fitzgerald-announces-next-generation-of-ownership/>,

<https://www.bloomberg.com/news/features/2026-03-18/tether-made-loan-to-lutnick-s-children-as-they-bought-his-assets>

¹⁶

<https://www.bloomberg.com/news/features/2026-03-18/tether-made-loan-to-lutnick-s-children-as-they-bought-his-assets>,

<https://www.salon.com/2025/04/24/a-5-star-rating-for-conflicts-of-interest-commerce-sec-howard-lutnicks-finances-raise-red-flags/>

¹⁷

<https://www.nytimes.com/2025/12/18/us/politics/howard-lutnick-conflicts-inspector-general.html> ,

¹⁸ <https://www.nmrk.com/people/kyle-lutnick>,

https://ir-api.egs.com/media/document/621bbef7-8547-4b77-8c8b-f377d02c4f28/assets/NMRK_3_Q_2025_Earnings_Presentation-vF_10.30.2025.pdf?disposition=inline#page=10

¹⁹ <https://www.nytimes.com/2025/12/18/us/politics/howard-lutnick-conflicts-inspector-general.html>

invested \$1.6 billion in the company.²⁰ Meanwhile, the company announced that it raised \$1.5 billion in private funds, with Cantor Fitzgerald serving as the lead placement agent.²¹ Cantor Fitzgerald also holds approximately \$1.2 billion of stock in Nvidia Corporation, a major developer of semiconductors and AI chips.²²

Tether Limited Inc. is the blockchain platform behind Tether, the world's largest stablecoin.²³ Cantor Fitzgerald earns fees as the primary custodian for the more than \$180 billion in reserves that back the stablecoin.²⁴ As of January 2025, Cantor Fitzgerald also held a bond in Tether Limited Inc. that's convertible to a 5% equity interest in the platform.²⁵

Tether has faced legal and congressional scrutiny for potential violations of U.S. anti-money laundering and sanctions laws that have tied the company's cryptocurrency to terrorism financing, North Korean nuclear weapons programs, Mexican drug cartels, Russian arms dealers, Middle Eastern terrorist groups, and Chinese manufacturers of chemicals used to make fentanyl.²⁶ In 2021, the CFTC ordered Tether to pay a \$41 million civil penalty "for making untrue or misleading statements and omission of material fact in connection with" its stablecoin and violating the Commodity Exchange Act.²⁷ Yet, as Commerce Secretary, Lutnick is also a member of President Trump's Working Group on Digital Asset Markets that developed a regulatory framework for the cryptocurrency industry that will directly impact Tether.²⁸

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<https://www.reuters.com/business/us-house-democrat-blasts-commerces-highly-concerning-16-billion-usa-rare-earth-2026-03-20/>

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<https://www.reuters.com/business/us-house-democrat-blasts-commerces-highly-concerning-16-billion-usa-rare-earth-2026-03-20/>

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<https://www.benzinga.com/markets/24/11/42158373/trumps-commerce-secretary-pick-howard-lutnicks-fund-owns-1-19b-in-nvidia-804m-in-tesla-here-is-a-look-at-his-portfolio> and <https://stockzoa.com/ticker/nvda/ownership/cantor-fitzgerald-l-p/>

23 <https://tether.to/en/about-us>,

<https://www.reuters.com/world/americas/tether-slows-gold-purchases-usdt-reserves-first-quarter-data-shows-2026-05-01/>

24 <https://intel.arkm.com/explorer/entity/tether>,

<https://finance.yahoo.com/markets/crypto/articles/two-us-senators-seek-cantor-100000624.html>, <https://www.wsj.com/livecoverage/fed-interest-rate-tesla-meta-earnings-01-29-2025/card/sen-warren-presses-howard-lutnick-on-tether-ties-before-confirmation-hearing-cEvRGcskZwmj7N8FuOjk>

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<https://www.wsj.com/livecoverage/fed-interest-rate-tesla-meta-earnings-01-29-2025/card/sen-warren-presses-howard-lutnick-on-tether-ties-before-confirmation-hearing-cEvRGcskZwmj7N8FuOjk>, <https://finance.yahoo.com/markets/crypto/articles/two-us-senators-seek-cantor-100000624.html>,

26 https://www.warren.senate.gov/imo/media/doc/letter_to_lutnick.pdf,

<https://www.wsj.com/finance/currencies/federal-investigators-probe-cryptocurrency-firm-tether-a13804e5?msockid=396bfc14216d658c2695e838207f6428>

27 <https://www.cftc.gov/PressRoom/PressReleases/8450-21>

28

<https://www.whitehouse.gov/presidential-actions/2025/01/strengthening-american-leadership-in-digital-financial-technology/>

Lobbyists turned regulators

The regulatory capture rampant in Trump’s first term has continued into his second, where former lobbyists occupy positions in the Commerce Department that directly oversee policies they once sought to influence. Some examples—

Joyce Meyer

Title: Under Secretary for Economic Affairs, overseeing the Bureau of Economic Analysis and the U.S. Census Bureau

Prior employment: American Council of Life Insurers

At the American Council of Life Insurers, Meyer oversaw the life insurance industry’s federal, state, and international lobbying.²⁹ She was named a “Top Lobbyist” by both the National Institute for Lobbying and Ethics and *The Hill*.³⁰ Meyer now oversees the Bureau of Economic Analysis and the U.S. Census Bureau—agencies that produce economic statistics used to shape federal policies on taxes, interest rates, and spending.³¹

Harry Kumar

Title: Assistant Secretary for Legislative and Intergovernmental Affairs

Prior employment: Li-Cycle Holdings Corp.

Kumar was a senior lobbyist for Li-Cycle, a lithium-ion battery recycling company purchased by the commodity trading and mining multinational Glencore in August 2025.³² Kumar now leads Commerce’s congressional relations, making him the principal adviser to the secretary on legislative issues as well as working with state, local, and tribal governments.³³ Glencore spent \$820,000 on lobbying in 2025, targeting both chambers of Congress as well as several agencies, including the Department of Commerce.³⁴

William Palmer

Title: Director of Legislative Affairs for Intelligence and National Security

Prior employment: Kelley Drye & Warren LLP

Palmer was a lobbyist at Kelley Drye & Warren, representing clients including the Municipal Castings Association, Alliance for American Manufacturing, and McWane, a

²⁹ <https://www.commerce.gov/about/leadership/joyce-y-meyer>, <https://www.acli.com/about-acli/who-we-are>

³⁰ <https://www.acli.com/posting/nr21-055>, <https://thehill.com/homenews/4340803-the-hills-top-lobbyists-2023/>

³¹ <https://www.bea.gov/about/who-we-are>, <https://www.commerce.gov/about/leadership/joyce-y-meyer>

³² <https://projects.propublica.org/trump-team-financial-disclosures/appointees/kumar-harry/>

³³ <https://www.commerce.gov/bureaus-and-offices/os/legislative-and-intergovernmental-affairs>, https://www.commerce.senate.gov/wp-content/uploads/media/doc/7.9.25_Harry%20Kumar%20Opening%20Statement.pdf

³⁴ <https://lda.senate.gov/filings/public/filing/e3c598d0-8427-43d4-b580-c368ab20af4c/print/>, <https://www.glencore.com/what-we-do/recycling/li-cycle>, <https://www.glencore.com/>

manufacturer of waterworks and plumbing products.³⁵ He now manages the department's congressional relations regarding intelligence and national security, including international trade—a key practice area for Kelley Drye.³⁶

Embedded corporate lawyers

Similar to lobbyists, these hired guns are now in positions to benefit their former clients.

Jeffrey Kessler

Title: Under Secretary for Industry and Security

Prior employment: WilmerHale

Kessler has floated back and forth between the WilmerHale law firm, where he began his career as an attorney in 2011, and the Department of Commerce.³⁷ After working at WilmerHale for eight years, he was appointed Assistant Secretary of Commerce for Enforcement and Compliance in 2019, during the first Trump administration and served in that position until January 2021, when he returned to WilmerHale as a partner.³⁸ In March 2025, he became the Under Secretary of Commerce for Industry and Security in the Department of Commerce's Bureau of Industry and Security.³⁹ While at WilmerHale, Kessler represented more than 50 clients in a wide range of industries, including The Boeing Company, BMW, Cisco, Eli Lilly and Company, Honeywell International, Inc., GE Healthcare Technologies, Inc., Meta Platforms, Inc., MGM Resorts International Operations, Inc., Mitsubishi Chemical America, Inc., and The Walt Disney Company.⁴⁰ He also represented the Japanese Ministry of Economy, Trade, and Industry. The Bureau of Industry and Security, which Kessler heads, enforces U.S. export control laws and plays a critical role enforcing the regulatory system governing the export of technology, software, equipment, and commodities that American companies can sell or transfer to foreign buyers.⁴¹

Patrick Butler

Title: Deputy General Counsel for Litigation

Prior employment: Kirkland & Ellis LLP

³⁵

<https://www.documentcloud.org/documents/26101249-palmer-william-r-office-of-the-secretary-os-new-entrant-278-2025-2025-05-06/>, <https://www.mcwane.com/>,

³⁶ <https://www.kelleydrye.com/practices/international-trade>

³⁷

<https://www.wilmerhale.com/en/insights/news/20250314-wilmerhale-congratulates-partner-jeffrey-kessler-on-his-senate-confirmation-as-us-commerce-under-secretary-for-industry-and-security>

³⁸

<https://www.wilmerhale.com/en/insights/news/20250314-wilmerhale-congratulates-partner-jeffrey-kessler-on-his-senate-confirmation-as-us-commerce-under-secretary-for-industry-and-security>

³⁹

<https://www.wilmerhale.com/en/insights/news/20250314-wilmerhale-congratulates-partner-jeffrey-kessler-on-his-senate-confirmation-as-us-commerce-under-secretary-for-industry-and-security>,

⁴⁰ <https://projects.propublica.org/trump-team-financial-disclosures/appointees/kessler-jeffrey/>

⁴¹ <https://www.commerce.gov/bureaus-and-offices/bis>,

<https://www.commerce.gov/bureaus-and-offices/bis>

Butler leads the department's litigation across all 13 bureaus.⁴² As an associate at Kirkland & Ellis, his clients included Boeing, Charter Communications, and Syngenta—an agrochemical company owned by ChemChina, an enterprise on the Department of Defense's list of Chinese military companies.⁴³

David Shapiro

Title: Chief counsel of the U.S. Investment Accelerator, U.S. government's director on the board of U.S. Steel

Prior employment: Wachtell, Lipton, Rosen & Katz

Created by President Trump, the U.S. Investment Accelerator helps businesses navigate government regulatory processes.⁴⁴ Previously, Shapiro was a partner in the white-shoe law firm Wachtell, Lipton's corporate practice, which advises on mergers and acquisitions.⁴⁵ One of Shapiro's clients at Wachtell Lipton was Fortress Investment Group, an investment manager with \$48 billion in assets under management. Its ownership includes Mubadala, Abu Dhabi's sovereign wealth fund.⁴⁶

The defense and tech revolving door

Several Commerce appointees came from defense contractors and technology companies whose products are regulated by the very bureaus they now oversee.

Joe Bartlett

Title: Deputy Under Secretary, Bureau of Industry and Security

Prior Employment: Skydio

Before joining Commerce, Bartlett was the director of federal policy at Skydio, a leading American drone manufacturer that sells to the U.S. military and is subject to BIS export controls governing what defense technology can be sold to foreign buyers.⁴⁷ He now

⁴² <https://www.commerce.gov/ogc/about/leadership/patrick-butler>

⁴³

<https://www.documentcloud.org/documents/26102160-butler-patrick-l-office-of-general-counsel-ogc-new-entrant-278-2025-2025-06-14/>,
<https://www.syngenta.com/media/media-releases/2017/syngenta-shareholders-accept-chemchina-offer>, <https://www.chemchina.com/zghgen/index.html>,
<https://www.chemchina.com/zghgen/about/intr/A045001001Gone1.html>,
<https://media.defense.gov/2026/Jun/08/2003945537/-1/-1/1/ENTITIES-IDENTIFIED-AS-CHINESE-MILITARY-COMPANIES-OPERATING-IN-THE-UNITED-STATES-IN-ACCORDANCE-WITH-SECTION-1260H.PDF>

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<https://www.whitehouse.gov/presidential-actions/2025/03/establishing-the-united-states-investment-accelerator/>

⁴⁵ <https://www.wlrk.com/practices/corporate/>

⁴⁶

<https://www.fortress.com/media/2024-05-15-fortress-management-and-mubadala-complete-acquisition-of-fortress-investment-group>,

⁴⁷ <https://www.linkedin.com/in/joe-bartlett-010310112/>,

<https://projects.propublica.org/trump-team-financial-disclosures/appointees/bartlett-joseph/>,

<https://www.linkedin.com/company/skydio/>

serves as deputy under secretary of a bureau that regulates his former employer's products.⁴⁸

Jessica Curyto

Title: Deputy Assistant Secretary for Technology Security, Bureau of Industry and Security

Prior employment: The Chertoff Group; Institute for Defense Analyses

This is Curyto's second stint in Commerce's Bureau of Industry and Security, having served as acting chief of staff for security and industry in Trump's first term.⁴⁹ The bureau focuses on industrial angles of national security, economic security, cybersecurity, and homeland security.⁵⁰ Between government jobs, Curyto was a senior director at the Chertoff Group, a consultancy that advises corporations on markets and investment opportunities for security and security technology, policy and regulatory engagement, and cyber risks.⁵¹

Eric Chacon

Title: Senior Advisor, National Telecommunications and Information Administration (NTIA)

Prior employment: AT&T

NTIA is the "agency principally responsible by law for advising the President on telecommunications and information policy issues."⁵² Telecommunications policy is central to his previous employer, AT&T, which claims to operate the largest wireless network in North America.⁵³

NOAA and Commercializing the Weather Agency

Taylor Jordan

Title: Assistant Secretary of Commerce for Environmental Observation and Prediction, and Director of the Office of Space Commerce

Prior employment: Innovative Federal Strategies

Jordan worked for Congress on the House Science, Space & Technology Committee's Subcommittee on Environment from 2011 to 2018, when he became a Senior Policy Advisor at the Department of Commerce's National Oceanic & Atmospheric Administration (NOAA).⁵⁴ He left that position in 2021 and took a position as a lobbyist at

⁴⁸ <https://www.linkedin.com/in/joe-bartlett-010310112/>, <https://projects.propublica.org/trump-team-financial-disclosures/appointees/bartlett-joseph/>, <https://www.bis.gov/about-bis/guiding-principles>, https://downloads.regulations.gov/BIS-2025-0092-0009/attachment_2.pdf

⁴⁹ <https://www.linkedin.com/in/jessica-curyto-a737587>

⁵⁰ <https://www.bis.gov/about-bis/guiding-principles>

⁵¹ <https://chertoffgroup.com/geopolitical-regulatory-risk/>

⁵² <https://www.ntia.gov/page/about-ntia>

⁵³ <https://about.att.com/pages/corporate-profile>

⁵⁴ <https://www.linkedin.com/in/taylor-jordan-5915b94a/>

Innovative Federal Strategies.⁵⁵ As a lobbyist there from 2021 to 2025, he represented 18 separate companies, primarily involved in various space commerce operations, including satellite development and weather forecasting companies, including AccuWeather.⁵⁶ That company has pushed to limit the freely available weather forecasts developed by NOAA.⁵⁷ In addition, Jordan also represented the Association for the Advancement of Artificial Intelligence from 2021 to 2024—creating serious potential conflicts of interest.⁵⁸

Neil Jacobs

Title: Under Secretary of Commerce for Oceans and Atmosphere, and NOAA Administrator

Prior employment: Spire Global

Between leaving NOAA in 2021 and returning in 2025, Jacobs consulted for space-based weather data company Spire Global, helping to further commercialize the company's products and strengthen its data offerings to the government.⁵⁹ He was helping a private company sell weather data to the government; now he runs the government agency that would buy it.

During his stint as Acting NOAA Administrator in Trump's first term, Jacobs permitted NOAA to issue a statement contradicting the National Weather Service's accurate Hurricane Dorian forecast, providing political cover for Trump's incorrect claim that the storm had threatened Alabama—an episode known as "Sharpiegate."⁶⁰

Juan Caro

Title: Deputy Assistant Secretary for International and Space Affairs, National Oceanic and Atmospheric Administration

Prior employment: Redline Consulting LLC

Before joining NOAA, Caro was president of Redline Consulting, where his clients included Scale AI, a company that sells data and AI services to the federal

⁵⁵ <https://www.linkedin.com/in/taylor-jordan-5915b94a>

⁵⁶ <https://projects.propublica.org/trump-team-financial-disclosures/appointees/jordan-taylor/>

⁵⁷

<https://www.bloomberg.com/news/features/2018-06-14/trump-s-pick-to-lead-weather-agency-spent-30-years-fighting-it>

⁵⁸ <https://projects.propublica.org/trump-team-financial-disclosures/appointees/jordan-taylor/>, <https://www.openlobby.us/lobbyists/taylor-jordan>

⁵⁹ <https://projects.propublica.org/trump-team-financial-disclosures/appointees/jacobs-neil/>, <https://spire.com/>,

<https://spire.com/press-release/neil-jacobs-joins-spire-global-as-scientific-advisor/>

⁶⁰

<https://www.cbsnews.com/news/trump-picks-neil-jacobs-known-for-sharpie-gate-incident-to-head-noaa/>,

<https://www.seattletimes.com/seattle-news/health/trump-picks-former-chief-entangled-in-sharpiegate-to-lead-noaa/>

government.⁶¹ He now oversees NOAA's international engagements, including space commerce—while his former client is engaging with the Commerce Department on AI export policy, having submitted a formal response to a proposed American AI Exports Program in December 2025.⁶²

Conclusion

Public Citizen proposes the following:

- Executive branch personnel subject to appointment or confirmation, as well as senior White House personnel, should sign an enforceable pledge agreement to recuse themselves from taking any official action that impacts a former employer or client within the last two years, or directly and substantially affects a particular matter personally lobbied on or involving a specific party or parties related to a former employer or client of the last two years, including regulations and contracts.
- Waivers from ethics requirements for senior executive branch personnel should be issued only for cause and in writing available for public inspection in a centralized database.
- Each agency and division within the executive branch should appoint its own Designated Agency Ethics Officials (DAEOs) to advise and enforce ethics laws and rules among agency personnel, but DAEOs should be under the ultimate authority of the Director and subject to periodic training by OGE.
- OGE should also establish a public clearinghouse on executive branch ethics laws and rules, advisory opinions, enforcement actions, transparency records and waivers.

Methodology

To conduct this research, we downloaded all of the disclosures from Commerce employees in ProPublica's database of disclosures senior administration officials are required to file with the Office of Government Ethics ([Form 278e](#)), relying on a script from the AI tool Claude. That yielded disclosures for 112 Trump appointees. The authors then reviewed the disclosures for what appeared to be the most egregious conflicts. To make sure we captured current employees in their current roles, we looked up all the officials on LinkedIn and [commerce.gov](#). We also looked at lobbying disclosures, archived images of the officials' past employers' websites, and other sources.

⁶¹ <https://projects.propublica.org/trump-team-financial-disclosures/appointees/caro-rivera-juan-a/> , <https://www.google.com/search?q=Scale+AI%2C&oq=Scale+AI%2C&sourceid=chrome&ie=UTF-8>

⁶² <https://www.noaa.gov/our-people/leadership/juan-caro> , <https://scale.com/blog/setting-the-global-ai-standard-american-ai-exports>