



# President Trump's Drain The Swamp Report Card



Prepared by the  
Offices of Senators Elizabeth Warren  
and Sheldon Whitehouse  
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## EXECUTIVE SUMMARY

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Americans are fed up with special interest lobbyists and industry insiders controlling the levers of power in Washington, D.C., and rigging the system against the interests of ordinary Americans. During his campaign, President Trump criticized entrenched special interests that have “rigged our political and economic system for their exclusive benefit” and swore that he would “not be controlled by the donors, special interests and lobbyists who have corrupted our politics and politicians for far too long.”

On the campaign trail, President Trump repeatedly promised to “drain the swamp,” but he has betrayed this promise. This “Drain the Swamp Report Card” contains an extensive review of how, in his first six months, President Trump handed his administration over to corporate insiders and Beltway lobbyists. It catalogues in detail the presence of these “Swamp Creatures” in the Trump Administration and the impact they have had on President Trump’s policies and on the American public.

**President Trump gets a failing grade on this first Drain the Swamp Report Card. He has undermined important ethics rules, filling his Transition Team and Administration with over 190 former lobbyists, special interests, and corporate insiders. He has broken his promises and rigged his administration to let the special interests run rampant. Trump’s Swamp Creatures have been great for powerful corporations, but the rest of America is paying the price. President Trump has not drained the swamp—he has let the Swamp Creatures take over.**

Detailed findings of the analysis include:

**1. [President Trump filled his Transition Team and Administration with lobbyists, allowing special interests to dictate and shape his Administration.](#)**

Over the course of his Transition and the first six months of his Administration, President Trump was advised by, or has hired, at least 160 current and former lobbyists. Fifty-seven of these lobbyists served on his Transition Team, 79 currently work for or worked for the Trump Administration, and 24 worked for both the Trump Transition Team and the Administration.

Examples include:

- A former energy lobbyist for Dow Chemical and the Southern Company, who led the Trump Transition’s Department of Energy and Nuclear Regulatory Commission teams;
- A former financial services lobbyist for MetLife and American Express, who now advises President Trump as the Special Assistant for Financial Policy at the National Economic Council; and
- A former transportation lobbyist, who now works as Chief of Staff at the Department of Transportation.

**2. [President Trump has also relied on dozens of industry insiders to run his Transition and his Administration.](#)** President Trump has put dozens of Wall Street executives and D.C.-based corporate consultants and industry insiders in important government positions since taking office. This report highlights 37 of these swamp-dwellers who either advised the President during the Transition Period or were hired by or nominated by President Trump to staff his administration. The former President of Goldman Sachs, for example, runs the President’s National Economic Council, while a “paid consultant for Verizon” advised his Transition Team on Federal Communications Commission issues.

**3. [President Trump’s ethics order and other actions weakened the rules and failed to protect the American public from Swamp Creatures.](#)**

President Trump signed an executive order on January 28, 2017, that the Trump Administration claimed was supposed to slow the revolving door between government and the private sector. Unfortunately, this executive order lacked key protections against lobbyists that had been included in a similar order issued by President Obama. The omission allowed President Trump to fill his Administration with a slew of lobbyists and corporate special interests. And the President has continued to undermine ethics rules and break his own promises, allowing corporate

lobbyists, consultants, and special interests to invade Washington at the expense of the American people.

4. [President Trump's broken promise to "drain the swamp" has been great for corporate America, but has hurt ordinary Americans.](#) The problems created by a government run by special interests are real. When key decision-makers at the highest levels of governments have conflicts of interest and long-standing ties to corporate America, it is no surprise that the policies they create are designed to benefit those corporations and special interests - leaving the American people behind. President Trump's Administration has already adopted or supported multiple policies that leave workers and middle class families out in the cold while aiding

special interests. These include:

- The White House abandoned seniors and families, instead giving in to the demands of big pharmaceutical companies after hiring a former pharmaceutical lobbyist to lead President Trump's Drug Pricing Working Group.
- The Department of Labor put efforts to protect construction workers from toxic substances on hold after receiving advice from a construction industry lobbyist during the transition.
- The Education Department delayed important rules protecting students from predatory institutions after hiring former lobbyists from the for-profit college industry.



Throughout his campaign and after he took office, President Trump promised the American people that he would “drain the swamp” of D.C. lobbyists, special interest groups, and corporate insiders.

During his campaign, President Trump attacked the special interests that have “rigged our political and economic system for their exclusive benefit,”<sup>1</sup> claiming he would work “only...for the people of the U.S.”<sup>2</sup> He told the American people that he would “not be controlled by the donors, special interests and lobbyists who have corrupted our politics and politicians for far too long.”<sup>3</sup> Time and time again, Donald Trump promised to “drain the swamp.”<sup>4</sup>

### 1. [President Trump bragged that “no lobbyists” would work for his Administration, promising a “five-year lobbying ban on White House officials” and a “lifetime ban on lobbying” foreign governments.](#)

On the campaign trail, then-candidate Donald Trump was critical of lobbyists’ influence in Washington. In June 2016, Trump announced that he “would have no problem with” saying that “no lobbyists will work for [him]” in the White House.<sup>5</sup> In October 2016, he proposed an ambitious “package of ethics reforms” designed to “make [the] government honest.” This ethics reform package included a promise to “re-institute a 5-year ban on all executive branch officials lobbying the government,” and a vow “to issue a lifetime ban against senior executive branch officials lobbying on behalf of a foreign government.”<sup>6</sup> Trump also assured Americans that he would “ask Congress to pass [the 5-year- ban on executive branch officials lobbying the government] into law so that it cannot be lifted by executive order” and to “institute its own 5-year ban on lobbying by former members of Congress and their staffs.”<sup>7</sup>

After the election, then President-elect Trump filled his Transition Team with lobbyists and industry insiders. Following public outcry over the participation of registered lobbyists on his Transition Team, the President announced an ethical code of conduct for

members of his Transition Team that included a restriction on lobbyists. The code of conduct required registered lobbyists on the Transition Team “to terminate their formal registration to lobby.” The Team also announced a six-month lobbying ban for Transition Team members, who were required to sign agreements stating that they would not engage in lobbying activities for six months after they served on the Transition.<sup>8</sup>

On January 28, 2017, just days after taking office, President Trump issued Executive Order 13770, *Ethics Commitments by Executive Branch Appointees*. The Executive Order includes an Ethics Pledge that “every appointee in every executive agency appointed on or after January 20, 2017” must comply with. The Pledge includes:<sup>9</sup>

- **A Five-Year Ban on Lobbying After Serving in Government:** Appointees must agree to “not, within 5-years after the termination of my employment as an appointee in any executive agency...engage in lobbying activities with respect to that agency.”
- **A Lifetime Ban on Lobbying Foreign Governments:** Appointees commit to “not, at any time after the termination of my employment in the United States Government, engage in any activity on behalf of any foreign government or foreign political party which...would require me to register under the Foreign Agents Registration Act...”
- **A Restriction on Former Lobbyists’ Activities in the Administration:** President Trump’s pledge requires that former lobbyists commit to avoid working on particular matters they lobbied on in the two years prior to joining the Administration.

### 2. [President Trump promised to “stop the gravy train” for corporate consultants and to keep Wall Street insiders from “getting away with murder.”](#)

In May 2016, Trump promised Americans that he was “going to stop the gravy train for all these consultants, and all these people that are ripping off our country.”<sup>10</sup>

He pledged that corporate consultants would not receive special treatment in his administration, promising that he would “expand the definition of lobbyist so we close all the loopholes that former government officials use by labeling themselves consultants, advisors, all these different things.”<sup>11</sup>

## BACKGROUND AND METHODOLOGY

Just a week after the election, President-elect Trump’s personnel decisions were already raising concerns that he was filling his transition team with lobbyists and corporate insiders—the special interests he had promised to banish from Washington. These initial hires betrayed his campaign promises and raised concerns that he was creating a government that prioritized the needs of special interests rather than those of millions of hard-working Americans. This report presents the updated results of an ongoing review of President Trump’s commitment to drain the swamp.

Six months into President Trump’s term, it presents an Administration-wide assessment of whether President Trump has kept—or broken—his promises to “drain the swamp.” To conduct this analysis, staff reviewed press reports, nominee profiles, and other sources to identify the backgrounds of hundreds of Administration hires and Transition Team Advisors. Specifically, staff relied on the following sources:

- Public Citizen’s report on 75 members of the Trump Transition “Landing Teams,”<sup>14</sup> released in November 2016;
- Law firm Steptoe & Johnson’s list of nearly 500 Trump Transition Team Members,<sup>15</sup> released in December 2016;
- *ProPublica*’s list<sup>16</sup> of nearly 500 “beachhead team” hires, last updated in April 2017;
- *ProPublica*’s collection of financial disclosures<sup>17</sup> of over 400 Trump Administration appointees, last updated in July 2017;
- Public Citizen’s analysis of 115 of President Trump’s sub-Cabinet-level nominees<sup>18</sup>, released in June 2017;
- Press releases and announcements on

President Trump has also railed against Wall Street executives and bankers who take advantage of the federal government for their own personal gain, hurting working families in the process. During the election, he proclaimed that he was “not going to let Wall Street get away with murder.”<sup>12</sup>

WhiteHouse.gov listing new hires and nominees, including a report released to Congress on June 30<sup>th</sup> on White House Office personnel<sup>19</sup>; and

- Press reports on the Trump Transition Team and Administration from the *New York Times*, *Washington Post*, *Politico*, *The Hill*, *Bloomberg*, and other publications.

Staff matched Trump Transition Team and Administration hires with the U.S. Senate Lobbying Disclosure Act Database to determine their lobbying histories, and confirmed the identity of formerly- and currently-registered lobbyists by matching lobbying disclosure reports with the publicly-available LinkedIn profiles, or other employment profiles (such as biographies listed on former employers’ websites) of President Trump’s hires.

To identify “corporate insiders,” staff compiled a list of selected former corporate executives, government contractors, and corporate consultants who have assisted, or are working for, President Trump, during the Transition or in the Administration.

The results of this review are particularly alarming because President Trump has yet to fill hundreds of key government positions. As of June 2017, many top positions within the Trump Administration were vacant—including 85% of the “top science posts” at agencies like the Environmental Protection Agency and the National Oceanic and Atmospheric Administration.<sup>20</sup> President Trump’s Administration must hire around 4,000 people—over a thousand of which require Senate confirmation—to fill his government. Thus far, he has nominated fewer than 200 people for Senate confirmation.<sup>21</sup> Unless President Trump changes his approach to hiring former lobbyists and corporate insiders, hundreds more could end up in his Administration.

President Trump has betrayed his promise to drain the swamp. He has weakened important ethics rules and hired over 190 former lobbyists and corporate insiders to run his Transition Team and Administration. Trump Administration policies that these Swamp Creatures have helped put in place are great for special interests, but are harmful to America's workers and the middle class.

Six months into his first term, President Trump has not “drained the swamp”—and he appears to have no interest in doing so. The President, has yet to act on three components of his ethics reform package. He has not “ask[ed] Congress to institute its own 5-year ban on lobbying by former members of Congress and their staffs,” has not “expanded the definition of lobbyist so we can close [legal] loopholes,” and has not asked legislators to pass “a 5-year ban on all executive branch officials lobbying the government...into law so that it cannot be lifted by executive order.”<sup>22</sup> To make matters worse, President Trump has granted waivers to allow lobbyists and corporate insiders to make policy despite clear conflicts of interest. And he has ignored key ethical precedents governing his own behavior, refusing to release his tax returns or divest from his real estate business.

This review of the advisors and staff President Trump has chosen reveals that the President has betrayed his commitment to rid his Administration of lobbyists and special interests. It details a trail of broken promises and an Administration that serves special interests before ordinary Americans.

### 1. President Trump picked dozens of former lobbyists to advise his Transition and staff his Administration.

During his Transition and the first six months of his Administration, President Trump has hired at least 160 current and former lobbyists. Fifty-seven of the 160 lobbyists served on his Transition Team, 79 currently work for or worked for the Trump Administration; and 24 worked for both the Trump Transition Team and the Administration. The list includes:

- a. Current and Former Lobbyists who served on the Trump Transition Team.
  - **Thomas Carter**, who served as a Landing Team Member at the Department of Defense during the Trump Transition. Carter is a national security consultant and the former Vice President for Government Relations at Elbit Systems of America, a defense contractor.<sup>23</sup>
  - **Alex Flint**, who worked as the Confirmation Lead for Secretary of the Interior Ryan Zinke. Flint, a board member of the Keystone Energy Board, lobbied for the Nuclear Energy Institute in 2016.<sup>24</sup>
  - **Steve Hart**, a “top lobbyist” in D.C. whose firm has represented General Electric, Coca-Cola, Pfizer, and Visa, was the Labor Policy Lead for the Trump Transition Domestic Issues Agency Action Team.<sup>25</sup>
  - **Rolf Lundberg** served as the Trade Reform Lead on the Policy Implementation Team for the Trump Transition. Lundberg is the former Senior Vice President for Congressional and Public Affairs at the U.S. Chamber of Commerce and a current lobbyist for Choice Hotels and the International Franchise Association.<sup>26</sup>
  - **Mike McKenna**, an energy lobbyist whose clients at the time included Dow Chemical and the Southern Company, originally served as the Department of Energy and Nuclear Regulatory Commission Lead for the Trump Transition. McKenna left the Transition Team after a new ethics rule required lobbyists to drop their clients.<sup>27</sup>
  - **Patricia Paoletta** advised the Trump Transition on matters related to the Federal Communications Commission. Paoletta is a registered lobbyist whose clients included telecommunications companies RingCentral and T-Mobile.<sup>28</sup>
  - **Rebecca Rosen**, an Energy Policy advisor for the Trump Transition, is the Vice President of

Policy and Government Affairs at Devon Energy. Though Rosen promised she would “no longer be lobbying for the company” following a lobbyist shake-up of the Transition Team, Rosen remains employed by Devon Energy.<sup>29</sup>

- **Michael Torrey** advised the Transition Team on Agriculture Policy prior to leaving in November 2016. Torrey represents the American Beverage Association and the Snack Food Association (now called SNAC International), among other clients.<sup>30</sup>
- **Martin Whitmer**, a lobbyist for the National Asphalt Paving Association, advised the Transition Team on Transportation and Infrastructure.<sup>31</sup>

**b. Former Lobbyists who are serving, or have served, in the Trump Administration.**

- **Byron Anderson** works at the Department of Labor as a Special Assistant to the Secretary. He is the former Vice President of Federal Affairs at Transamerica, an insurance company, where he lobbied against financial regulations.<sup>32</sup>
- **Timothy Clark**, the White House Liaison at the Department of Health and Human Services, is the former President of the Clark Strategy Group, a lobbying firm who has represented the Pharmaceutical Research and Manufacturers of America.<sup>33</sup>
- **Jeffrey Gerrish** is President Trump’s nominee to be Deputy U.S. Trade Representative for Asia, Europe, and the Middle East, and Industrial Competitiveness. He formerly lobbied on behalf of U.S. Steel as Head of the International Trade Group at Skadden, Arps, Slate, Meagher, & Flom LLP.<sup>34</sup>

**c. Former Lobbyists who worked for both the Transition Team and the Trump Administration.**

- **Jennifer Arangio**, a former lobbyist for imaging company Perceptics LLC, served as a National Security Council Team Member for the Trump Transition. She is currently a Senior Director at the National Security Council.<sup>36</sup>

- **Geoffrey Burr** serves as Chief of Staff at the Department of Transportation and worked as the Confirmation Lead for Transportation Secretary Elaine Chao during the Trump Transition. Until September 2015, Burr was a lobbyist at Associated Builders and Contractors. Burr also briefly served as the Special Assistant to the Secretary the Department of Labor, where he worked to delay the Labor Department’s silica rule, which aims to protect construction workers from toxic substances in the workplace.<sup>37</sup>
- **Jack Kalavritinos** worked on the Transition Team as a lead staffer for Department of Education appointments and is currently the Associate Commissioner for External Affairs for the Food and Drug Administration. Until 2015, Kalavritinos was a registered lobbyist and Director of Government Affairs at medical device and pharmaceutical company Covidien.<sup>38</sup>
- **Sarah Makin**, a former lobbyist at Wise Public Affairs, served as the Scheduler to the Vice President-Elect on the Trump Transition Team. She currently serves as the Deputy Assistant to the President and Director of Public Engagement and Intergovernmental Affairs for the Vice President.<sup>39</sup>

President Trump has even selected a *current* lobbyist for the government of Saudi Arabia to serve in the White House. In June 2017, he appointed Richard Hohlt to serve as a member of the President’s Commission on White House Fellowships.<sup>40</sup> Hohlt is a “longtime Republican lobbyist,” and has received over \$400,000 since January 2017 for providing “advice on legislative and public affairs strategies” to the foreign ministry of Saudi Arabia. In May and June, Hohlt lobbied Congress “regarding an arms sale” on behalf of his Saudi Arabian clients.<sup>41</sup>

A list of the 160 identified lobbyists included in this report who currently or formerly worked for the Trump Administration or the Transition Team can be found in Appendices I and II.

**2. President Trump has filled his Administration with dozens of corporate insiders.**

After criticizing his campaign opponents for their corporate ties, claiming that “the guys at Goldman



Sachs...have total control over Hillary Clinton” and that Wall Street “owned her;”<sup>42</sup> President Trump turned immediately to Wall Street and corporate America to staff the executive branch. In addition to hiring dozens of lobbyists, President Trump has relied on the advice and service of Wall Street executives, Beltway-based consultants, and industry insiders. This report highlights 37 of these insiders who either advised the President during the Transition Period or were hired by or nominated by President Trump to staff his Administration. These include:

- **Paul Atkins**, the current CEO of a financial services consulting firm and former Securities and Exchange Commissioner during the run-up to the financial crisis, ran the Independent Financial Agencies Team for the Trump Transition. While working at the SEC, Atkins was an “outspoken critic” of levying fines on financial institutions that broke the law.<sup>43</sup>
- **Dan DiMicco**, the former CEO of steel maker Nucor and current Board Member of Duke Energy, advised the Trump Transition Team on issues affecting the U.S. Trade Representative.<sup>44</sup>
- **Jeffrey Eisenach**, a “paid consultant for Verizon,” advised the Transition Team on Federal Communications Commission issues. Eisenach also served as a registered lobbyist in 2006.<sup>45</sup>
- **Nancy Beck**, the Deputy Assistant Administrator at the Office of Chemical Safety and Pollution Prevention at the EPA, is the former Senior Director of Regulatory Science Policy at the American Chemistry Council, the “lead lobbying group” for the chemical industry whose members include Dow Chemical, DuPont, Exxon Mobil, and Chevron.<sup>46</sup>
- **Gary Cohn**, the former President and Chief Operating Officer of Goldman Sachs, is the Chief Economic Advisor at the National Economic Council. Cohn received a \$285 million payout after leaving Goldman Sachs to work for the Administration.<sup>47</sup>
- **Gregory Doud**, President Trump’s nominee for Chief Agricultural Negotiator, served as the President of the Commodity Markets Council, the leading trade association for commodities futures exchanges.<sup>48</sup>

- **David Ehrhart**, the President’s nominee for General Counsel of the Air Force, formerly worked as the Associate General Counsel for defense contractor Lockheed Martin.<sup>49</sup>
- **David Malpass**, the President’s nominee to serve as Under Secretary of the Treasury for International Affairs, is currently the President of Encima Global, a consulting firm for Wall Street clients. Malpass also served as the Chief Economist of Bear Stearns right before the financial crash and wrote in 2007 that “[h]ousing and debt markets are not that big a part of the U.S. economy, or of job creation.” Malpass also served as a co-leader of the Agency Action Team on Economic issues during the Trump Transition.<sup>50</sup>

President Trump has also allowed other individuals with clear conflicts of interest to serve as “unofficial advisers” and shape his Administration’s policy. For example, billionaire investor Carl Icahn serves as a “Special Advisor to the President on Regulatory Reform.” However, Icahn is not officially employed by the White House. Without a designation as a federal employee, Icahn is not subject to federal conflict of interest rules. Icahn has advised President Trump on matters and nominees—such as EPA regulations of oil refineries—that directly impact his business.<sup>51</sup>

See Appendix III for a list of the 37 Wall Street CEOs and other corporate insiders included in this report that President Trump relied on during the Transition and hired to serve his Administration.

### 3. [President Trump has undermined key ethics rules.](#)

#### a. [President Trump’s Weak Executive Order](#)

President Trump weakened ethics rules put in place by President Obama when he introduced Executive Order 13770, which he touted as closing ethics “loopholes.”<sup>52</sup> This order removed Obama-era restrictions that prevented former lobbyists from working at agencies they contacted as lobbyists. This has had a significant impact: at least 25 former lobbyists—including 8 members of the Transition Team, 14 Administration appointees and nominees, and 3 members of both the Transition Team and the Administration—either

advised or are working at agencies they have lobbied in the past two years. For example:

- **David Bernhardt**, the head of the Natural Resources Practice at the law firm Brownstein Hyatt Faber Schreck, is President Trump's nominee for Deputy Secretary of the Interior. He also advised the Trump Transition on Interior Department matters. While at Brownstein, Bernhardt lobbied on behalf of the Rosemont Copper Company. He lobbied the Interior Department as recently as 2016.<sup>53</sup>
- **Kristi Boswell**, the former Director of Congressional Affairs at the American Farm Bureau Federation, is now a Senior Advisor to the Secretary at the Department of Agriculture. Boswell lobbied the Department of Agriculture as late as 2017.<sup>54</sup>
- **Nova Daly** served as a Landing Team Member for the Office of the U.S. Trade Representative on the Transition Team. Daly is a lobbyist for Nucor, a steel maker. Daly claimed he "terminated all his lobbying activity" after a Transition Team shakeup required lobbyists to drop their clients. However, the Senate Lobbying Database shows that Daly registered as a lobbyist for Nucor and Solarworld in the fourth quarter of 2016 and the first quarter of 2017. Daly lobbied the U.S. Trade Representative as late as 2017.<sup>55</sup>
- **Makan Delrahim**, President Trump's nominee for Assistant Attorney General for the Antitrust Division at the Department of Justice, formerly worked as a lobbyist at Brownstein Hyatt Farber Schreck. Delrahim lobbied the Department of Justice in 2016.<sup>56</sup>
- **Taylor Hansen**, a former for-profit college lobbyist at the Association of Private Sector Colleges and Universities (currently known as the Career Education Colleges and Universities), worked as a Special Assistant to the Secretary at the Department of Education before resigning in March 2017. In 2016, Hansen lobbied the Department of Education on issues and regulations impacting for-profit colleges.<sup>57</sup>
- **Nathan Miller**, a Senior Advisor at the Small Business Association, lobbied the agency in 2016

on behalf of Newtek Business Services.<sup>58</sup>

- **Tara Bradshaw**, a former lobbyist for the New York Life Insurance Company and Met Life, was Treasury Secretary Steve Mnuchin's nominations adviser during the Transition. Bradshaw lobbied the Treasury Department as late as 2017.<sup>59</sup>

#### b. Use Of Waivers to Avoid Ethics Rules

Executive Order 13770 includes a set of protections purportedly in place to minimize conflicts of interest. But the Trump Administration has weakened these protections by granting at least 15 waivers to the Ethics Pledge for White House employees, including 4 former lobbyists.

- **Michael Catanzaro** is a Special Assistant to the President for Domestic Energy and Environmental Policy at the National Economic Council and advised the Trump Transition on Energy Policy in November 2016. Catanzaro is a former Partner at the CCGN Group, where he represented Devon Energy, the American Fuel and Petrochemical Manufacturers, and Encana Oil and Gas as recently as 2017. The White House issued an ethics waiver for Catanzaro in May that permits him to "participate in broad policy matters and matters of general applicability relating to the Clean Power Plan, the WOTUS rule, and methane regulations."<sup>60</sup>
- **Marcus Peacock** served briefly at the Office of Management and Budget (OMB), but left the White House to work as an Executive Vice President at the Business Roundtable, a lobbying firm for the financial industry whose work often overlaps with OMB. Peacock has promised to recuse himself from OMB work for six months—far short of the "5-year lobbying ban" that President Trump touted on the campaign trail, and that the Ethics Pledge requires.<sup>61</sup>
- **Shahira Knight** serves on the National Economic Council as a Special Assistant to the President on Tax and Retirement Policy. Knight is a former lobbyist and Vice President at Fidelity, where she worked on a variety of tax and retirement matters. The White House issued an ethics waiver for Knight that allows her to "participate in broad policy matters and particular matters of general applicability relating

to tax, retirement and financial services issues.”<sup>62</sup>

- **Andrew Olmem** is a Special Assistant to the President for Financial Policy at the National Economic Council. A former lobbyist at Venable, Olmem represented MetLife, a large insurance company that the Financial Stability Oversight Council designated as a “systemically important financial institution” (SIFI) in 2014. MetLife challenged the designation in court, and Olmem moved on to advise the President on financial policy. The White House issued an ethics waiver that exempts Olmem from the lobbying ban requirements of Executive Order 13770 and 5 C.F.R. § 2635.502(a), and just two months later the President ordered the Secretary of the Treasury to review and revise the SIFI designation process.<sup>63</sup>
- **Joshua Pitcock**, a former lobbyist at Pitcock Consulting, will serve as Vice President Pence’s Chief of Staff until August 2017. The White House issued an ethics waiver for Pitcock that allows him to participate in multiple policy matters.<sup>64</sup>

Numerous former lobbyists and industry insiders are working in the Trump Administration without waivers. It is unclear if these former lobbyists and insiders are recusing themselves completely from matters they worked on within the past two years.

Media reports have also highlighted behavior of Trump appointees and former Transition Team members that raise questions about whether they were following ethics requirements. For example:

- **Robert Wasinger** worked briefly as the White House Liaison at the Department of State. In March 2017, Wasinger left the Trump Administration to work as a lobbyist at McGuire Woods LLP, where he recently registered to lobby on behalf of Verizon and Inovio Pharmaceuticals. According to press reports, Wasinger never signed an Ethics Pledge while serving in the State Department.<sup>65</sup>
- **Ado Machida**, Policy Implementation Director on the Trump Transition, took a lobbying position at Navigators Global in February 2017—in spite of the Transition Team’s six-

month lobbying ban. Machida will represent AT&T, Oracle, & Microsoft.<sup>66</sup>

- **Scott Mason**, Director of Congressional Relations on the Trump Transition, registered as a lobbyist for Holland & Knight in January 2017, and has already lobbied on behalf of several clients, including Google, Nestle US, Inc., and Peabody Energy Corporation.<sup>67</sup>
- **Lauren Maddox** previously lobbied with the Podesta Group for the for-profit trade association Career Education Colleges and Universities and the for-profit Career Education Corporation. She deregistered as a lobbyist with the Podesta Group in order to serve as confirmation lead for Secretary of Education Betsy DeVos during the Trump Transition. Just days after Trump was sworn in, however, Maddox reregistered with the Podesta Group and is already lobbying the Education Department on behalf of “troubled for-profit law school” Charlotte School of Law.<sup>68</sup>
- **John Sweeney** served on the Trump Transition’s Executive Committee, but claims “he was never asked to sign the lobbying ban.” After leaving the transition, Sweeney registered as a lobbyist with SMW Partners, and has lobbied on behalf of Comcast and NES Financial, among others.<sup>69</sup>

#### 4. President Trump’s Administration of lobbyists and corporate insiders has developed and enacted policies that harm ordinary Americans.

President Trump’s betrayal of his promise to “drain the swamp” has been great for Washington insiders, but devastating for ordinary Americans. President Trump turned over his Administration to lobbyists and special interests—and now advocates or has put in place policies that benefit those special interests and leave the American people behind. Those policies include:

##### 1. Drug Pricing Policy Recommendations that would Hurt Seniors and Middle Class Families.

Seniors and every family that fills prescriptions have been hit hard by skyrocketing drug prices. President Trump admitted that “Pharma has a lot of lobbies, a lot of lobbyists, and a lot of power.”<sup>70</sup> He has claimed that the pharmaceutical industry is “getting away with murder,” and that “the cost of medicine in this

country is outrageous.”<sup>71</sup> He has promised that his administration will “bring it down” and that they will increase competition and introduce a “competitive bidding process” for prescription drugs.<sup>72</sup>

But when President Trump commissioned a Drug Pricing and Innovation Working Group to develop policy recommendations to reduce prescription drug prices, he picked a former pharmaceutical lobbyist, Joe Grogan, to lead the roundtable group. Mr. Grogan lobbied for Gilead Sciences, infamous for increasing the price of its hepatitis C drug to \$1,000 a pill, and is now the associate director of health programs for the Office of Management and Budget.<sup>73</sup>

It is therefore no surprise that the Drug Policy group’s recommendations “give the pharmaceutical industry much of what it has asked for.”<sup>74</sup> A draft executive order, nominally focused on drug prices, instead contains a series of proposals that Big Pharma has been pushing for years, including strengthening monopoly rights of pharmaceuticals overseas and curbing discounts that pharmaceutical companies are required to pay to hospitals and clinics that serve low-income communities.<sup>75</sup> The draft order contains nothing that will “guarantee that costs to consumers will drop.”<sup>76</sup> Health experts fear that President Trump’s policies will cause prices to increase even further.<sup>77</sup>

When President Trump filled the swamp with drug industry insiders, he betrayed his promises to the American people and now wants to give the trillion-dollar pharmaceutical industry a massive handout.

## 2. Labor Policies that Hurt Workers.

Despite repeatedly promising to prioritize the interests of American workers, President Trump sacrificed their health and safety by appointing a former industry lobbyist to the Department of Labor’s Transition Team. The Department of Labor oversees the Occupational Safety and Health Administration (OSHA), yet President Trump hired former lobbyist Geoffrey Burr, who represented the Associated Builders and Contractors, to the Labor Department Transition Team. The industry group that Mr. Burr lobbied for has a long record of opposing OSHA rules. For example, the group filed lawsuits or filings against three recent OSHA rules, including its recent rules targeting beryllium and silica (substances common

in the industry but linked to numerous lung diseases and cancer) and OSHA’s rule on workplace illness and injuries reporting requirements.<sup>78</sup>

The beryllium and silica rules would save hundreds of lives and prevent thousands of illnesses.<sup>79</sup> Yet within months of taking office, the Trump Administration issued proposed changes that could exempt major industries from the beryllium rule and delayed the silica rule. And the agency’s rule requiring reporting of workplace injuries would give the public access to information on worker health and safety. But the Trump Administration has delayed action on that rule.<sup>80</sup>

The Trump Administration has already sacrificed the health and safety of workers, and it’s easy to see why: President Trump has filled his administration with industry insiders and lobbyists who look out for huge corporations instead of the millions of workers who need their help most.

## 3. Education policies that harm students for the benefit of predatory, for-profit colleges.

The Trump Administration’s failure to drain the swamp has injured students across the country, particularly victims of predatory, for-profit colleges. President Trump appointed Taylor Hansen, a registered lobbyist who worked on behalf of the country’s largest trade group of for-profit colleges, Career Education Colleges and Universities (CECU), to serve on the Department of Education’s “beachhead team.” Mr. Hansen worked at the Department in February and March before resigning amid controversy.

President Trump and Education Secretary Betsy DeVos also named Robert Eitel, a former compliance officer and top lawyer at for-profit college operator Bridgepoint, as a senior advisor at the Department of Education.<sup>81</sup> Bridgepoint Education Inc. was recently fined \$23.5 million by the Consumer Financial Protection Bureau for deceiving students into taking on expensive private loans, and the company is currently under investigation by the Department of Justice, the Securities and Exchange Commission, and multiple state attorneys general. The for-profit college company also currently owes the Department a fine for miscalculating their federal student aid eligibility.<sup>82</sup>

President Trump's decision to give these industry insiders influence over the Education Department has already harmed students. The Department of Education recently announced it would be rewriting and delaying key provisions of two borrower-focused rules that had been criticized by the for-profit college industry.<sup>83</sup> The Department will reconsider the gainful employment rule, which requires schools to guarantee that their degree programs actually prepare students for jobs that will allow them to repay their student loans. Secretary DeVos also announced that the agency will delay the borrower defense to repayment rule, an Obama-era effort to "protect student borrowers and taxpayers against misleading and predatory practices," streamline the process for cancelling fraudulent loans, and protect students from predatory forced arbitration agreements.<sup>84</sup>

Once again, President Trump betrayed his promise to drain the swamp, and once again, the Swamp Creatures pushed policies that benefit industry at the expense of millions of Americans.

#### 4. Financial policies that harm retirees.

President Trump has also undermined efforts to support retirees by appointing lobbyists and industry representatives with a record of opposing pro-retiree policies. President Trump appointed Byron Anderson, a former financial services lobbyist and Vice President of Federal Affairs at Transamerica, a large national insurance company, to serve as a Special Advisor at the Department of Labor. He also named Shahira Knight, a former lobbyist for Fidelity, to be his Special Assistant for Tax and Retirement Policy. Both Knight and Anderson lobbied against the Department of Labor's fiduciary standard, a rule that the agency has fought for years to adopt that forces retirement advisors to act in the best interests of their clients when providing investment advice.<sup>85</sup>

In February, just months before its April applicability date, President Trump issued an executive order directing the Department of Labor to review the fiduciary rule, giving the agency a chance to look for reasons to publish a "proposed rule rescinding or revising" the fiduciary standard.<sup>86</sup> In April, the Department of Labor officially delayed the implementation of the rule until June. And while the

first stage of the rule has now taken effect, the future of the rule that protects retirees from harmful conflicts of interest is still in doubt.<sup>87</sup>

#### 5. Environmental policies that endanger Americans' health and safety.

Under President Trump, the EPA has boosted the interests of big oil and gas while endangering the health and safety of millions of Americans. The President hired Nancy Beck, the former Senior Director of Regulatory Science Policy at the American Chemistry Council, to serve as the Deputy Assistant Administrator for the Office of Chemical Safety and Pollution Prevention at the EPA. The American Chemistry Society is the "lead lobbying group" for the chemical industry whose members include Dow Chemical, DuPont, Exxon Mobil, and Chevron.<sup>88</sup> Elizabeth Bennett, a former lobbyist at the National Rural Electric Cooperative Association—a group that opposes almost a dozen EPA regulations—was hired to serve as the Deputy Associate Administrator of the Office of Congressional and Intergovernmental Relations at the EPA.<sup>89</sup> And Mark Maddox, a former lobbyist for several energy companies, including General Synfuels International, is serving as Assistant to the Secretary at the Department of Energy.

President Trump and his team of Swamp Creatures have quickly acted to do the energy industry's bidding. Just two months into his Administration, President Trump moved to roll back the Clean Power Plan.<sup>90</sup> The Administration has ordered a review and potential repeal of the Waters of the United States rule, stripping the EPA of much of its authority to control water pollution across the United States and therefore ensure access to safe drinking water for millions of Americans.<sup>91</sup> Industry insiders praised Trump's victory in November, and those same insiders have wormed their way inside our government to adopt policies that harm Americans.<sup>92</sup>

#### 6. Policies That Favor Big Banks, but Hurt Investors and Taxpayers

Despite repeatedly criticizing Wall Street during his campaign, President Trump has now handed top administration roles to numerous Wall Street CEOs—including appointing a former Goldman Sachs

banker, Steve Mnuchin, to lead the Department of the Treasury, and fellow Goldman alum, Gary Cohn, to be his Chief Economic Advisor. These are just two of the numerous bankers and Wall Street millionaires that President Trump has placed in charge of economic policy—policy that he promised during his campaign would be focused on boosting the middle-class and assisting American workers.<sup>93</sup>

But the interests of millions of hard-working Americans don't align with those of a handful of wealthy CEOs and bankers. In February, just weeks after taking office, President Trump immediately gave

a big handout to Wall Street, issuing an executive order that gave Secretary Mnuchin the authority to “restructure major provisions of Dodd-Frank” and weaken the law.<sup>94</sup> In April, President Trump signed two memoranda ordering reviews of several provisions of Dodd-Frank.<sup>95</sup> He has also supported Congressional legislation with a similar goal of rolling back Dodd-Frank that would “giv[e] a handout to Wall Street while putting everyday investors at risk.”<sup>96</sup> The President and his team of insiders offered more gifts to their old friends when he rolled out his tax plan, which promised to cut the corporate tax rate by more than half.<sup>97</sup>

## CONCLUSION

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President Trump's grade on his first Drain the Swamp Report Card is a big F. His Administration and Transition Team have been filled with over 190 lobbyists and corporate insiders, betraying his promise

to “drain the swamp.” His insider-drive policies are a boon for special interests—but will hurt millions of ordinary Americans.

## ENDNOTES

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- 1 Joseph Cariz, Taylor Leighton, Adam Thorp, “Donald Trump’s GOP acceptance speech, annotated,” *Politifact* (July 21, 2016) (online at <http://www.politifact.com/truth-o-meter/article/2016/jul/21/donald-trumps-gop-acceptance-speech-annotated/>).
- 2 Donald J. Trump, “By self-funding my campaign, I am not controlled by my donors, special interests, or lobbyists. I am only working for the people of the U.S.!” *Facebook* (September 5, 2015) (online at <https://www.facebook.com/DonaldTrump/posts/10156071933390725>).
- 3 Donald J. Trump, “I am self-funding my campaign and therefore I will not be controlled by the donors, special interests and lobbyists who have corrupted our politics and politicians for far too long. [ . . . ],” *Facebook* (October 23, 2015) (online at <https://www.facebook.com/DonaldTrump/posts/10156243341485725>).
- 4 “Trump: Ethics reform package will ‘drain the swamp,’” *CNN Politics* (online at <http://www.cnn.com/videos/politics/2016/10/17/donald-trump-ethics-reform-plan-green-bay-wi-sot.cnn>); Donald J. Trump, @realDonaldTrump, “I will Make Our Government Honest Again—believe me. But first, I’m going to have to #DrainTheSwamp in DC.[ . . . ],” *Twitter* (October 18, 2016) (online at <https://twitter.com/realDonaldTrump/status/788402585816276992>); Donald J. Trump, @realDonaldTrump, “If we let Crooked run the govt, history will remember 2017 as the year America lost its independence. #DrainTheSwamp,” *Twitter* (October 18, 2016) (online at <https://twitter.com/realDonaldTrump/status/788403448593002496>).
- 5 Justin Elliot, “Trump Then: ‘I Would Have No Problem’ Banning Lobbyists. Trump Now: You’re Hired!” *ProPublica* (February 14, 2017) (online at <https://www.propublica.org/article/trump-before-would-have-no-problem-banning-lobbyists-trump-now-youre-hired>).
- 6 Alex Swoyer, “Trump Proposes Government Ethics Reforms: ‘It Is Time to Drain The Swamp in Washington, D.C.’,” *Breitbart* (October 17, 2016) (online at <http://www.breitbart.com/2016-presidential-race/2016/10/17/trump-proposes-government-ethics-reforms-it-is-time-to-drain-the-swamp-in-washington-d-c/>).
- 7 Alex Swoyer, “Trump Proposes Government Ethics Reforms: ‘It Is Time to Drain The Swamp in Washington, D.C.’,” *Breitbart* (October 17, 2016) (online at <http://www.breitbart.com/2016-presidential-race/2016/10/17/trump-proposes-government-ethics-reforms-it-is-time-to-drain-the-swamp-in-washington-d-c/>).
- 8 Theodoric Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); Michael D. Shear and Eric Lipton, “Trump Team States Broader Limits on Lobbying by Former Staff,” *The New York Times* (November 16, 2016) (online at <https://www.nytimes.com/2016/11/17/us/politics/aides-to-donald-trump-announce-curbs-on-lobbyists.html>); “President-Elect’s Transition Team Code of Ethical Conduct,” *Wall Street Journal* (online at <http://www.wsj.com/public/resources/documents/ethicscode.pdf>).
- 9 The White House, *Executive Order: ETHICS COMMITMENTS BY EXECUTIVE BRANCH APPOINTEES* (January 28, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/01/28/executive-order-ethics-commitments-executive-branch-appointees0>).
- 10 Seth McLaughlin, “Donald Trump knocks Hillary Clinton on coal in West Virginia, vows to revive industry,” *The Washington Times* (May 5, 2016) (online at <http://www.washingtontimes.com/news/2016/may/5/donald-trump-knocks-hillary-clinton-coal-west-virg/>).
- 11 Catherine Ho, “Trump proposes five-year ban on executive branch officials and lawmakers who want to become lobbyists,” *Washington Post* (October 17, 2016) (online at [https://www.washingtonpost.com/news/powerpost/wp/2016/10/17/trump-proposes-five-year-ban-on-executive-branch-officials-and-lawmakers-who-want-to-become-lobbyists/?utm\\_term=.202b24ad7bf1](https://www.washingtonpost.com/news/powerpost/wp/2016/10/17/trump-proposes-five-year-ban-on-executive-branch-officials-and-lawmakers-who-want-to-become-lobbyists/?utm_term=.202b24ad7bf1)).
- 12 Jeff Guo, “Trump said hedge funders were ‘getting away with murder.’ How he wants one to help run the economy,” *Washington Post* (November 30, 2016) (online at [https://www.washingtonpost.com/news/wonk/wp/2016/11/30/trump-said-hedge-funders-were-getting-away-with-murder-now-he-wants-one-to-help-run-the-economy/?utm\\_term=.ae7d6ec12681](https://www.washingtonpost.com/news/wonk/wp/2016/11/30/trump-said-hedge-funders-were-getting-away-with-murder-now-he-wants-one-to-help-run-the-economy/?utm_term=.ae7d6ec12681)).
- 14 Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>).
- 15 Steptoe & Johnson, LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources->

- [detail-11703.html](#)).
- 16 Al Shaw, Justin Elliott, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).
  - 17 Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, *ProPublica* (June 5, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).
  - 18 Public Citizen, *The Swamp Nominees* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).
  - 19 Executive Office of the President, *Annual Report to Congress on White House Office Personnel* (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>).
  - 20 *Note*: According to the Washington Post, “it’s important to note that for some key science posts, Trump or his administration may have installed a person in an acting or other capacity, without formally naming that individual as the nominee or submitting a nomination to the Senate for confirmation. Or a likely nominee may have been named in the press....[T]hose appointments wouldn’t be counted here.”
- Chris Mooney**, “85 percent of the top science jobs in Trump’s government don’t even have a nominee,” *Washington Post* (June 6, 2017) (online at [https://www.washingtonpost.com/news/energy-environment/wp/2017/06/06/trump-has-filled-just-15-percent-of-the-governments-top-science-jobs/?utm\\_term=.7334aac46d1c](https://www.washingtonpost.com/news/energy-environment/wp/2017/06/06/trump-has-filled-just-15-percent-of-the-governments-top-science-jobs/?utm_term=.7334aac46d1c)); Donna Borak, “Trump is crippling his agenda by leaving top jobs unfilled,” *CNN Money* (June 7, 2017) (online at <http://money.cnn.com/2017/06/07/news/economy/trump-staffing-vacancies/index.html>).
- 21 Louis Nelson, “Trump blames ‘can’t win’ Democrats for stalled nominations,” *Politico* (July 11, 2017) (online at <http://www.politico.com/story/2017/07/11/trump-tweet-democrats-stalled-nominations-240394>); Bonnie Berkowitz and Kevin Uhrmacher, “It’s not just the Cabinet: Trump’s transition team may need to find about 4,100 appointees,” *Washington Post* (December 5, 2017) (online at <https://www.washingtonpost.com/graphics/politics/trump-transition-appointments-scale/>); Partnership for Public Service, “Political Appointee Tracker” (online at <https://ourpublicservice.org/issues/presidential-transition/political-appointee-tracker.php>); “Tracking how many key positions Trump has filled so far,” *Washington Post* (July 14, 2017) (online at <https://www.washingtonpost.com/graphics/politics/trump-administration-appointee-tracker/database/>).
  - 22 Alex Swoyer, “Trump Proposes Government Ethics Reforms: ‘It Is Time to Drain The Swamp in Washington, D.C.’,” *Breitbart* (October 17, 2016) (online at <http://www.breitbart.com/2016-presidential-race/2016/10/17/trump-proposes-government-ethics-reforms-it-is-time-to-drain-the-swamp-in-washington-d-c/>); Public Citizen, “Broken Promises” (March 22, 2017) (online at <https://medium.com/public-citizen/broken-promises-faffa5c7a28e>).
  - 23 Public Citizen, “Corporate Interests Infest Trump Transition at Federal Agencies” (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Thomas Carter” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); National Defense Industry Association (NDIA), “Maj Gen Thomas Carter, USAF (Ret)” (online at <http://www.ndia.org/events/2017/2/7/feb-procurement-division-meeting/speakers/major-general-thomas-carter>).
  - 24 Andrew Restuccia and Nancy Cook, “Trump’s Sherpas,” *Politico* (December 26, 2016) (online at <http://www.politico.com/story/2016/12/trump-cabinet-picks-nomination-sherpas-232941>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Alex Flint” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Alex Flint,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/alex-flint-0a294574/>).
  - 25 Tony Romm, “New details emerge on Trump transition organization,” *Politico* (November 9, 2016) (online at <http://www.politico.com/story/2016/11/new-details-emerge-on-trump-transition-organization-231152>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Steve Hart” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Top Lobbyists 2015: Hired Guns,” *The Hill* (October 29, 2015) (online at <http://thehill.com/business-a-lobbying/top-lobbyists/258462-top-lobbyists-2015-hired-guns>).
  - 26 U.S. Chamber of Commerce, “Rolf Lundberg, Jr.” (online at [https://www.uschamber.com/sites/default/files/legacy/staff/lundberg\\_rolf\\_bio1011.pdf](https://www.uschamber.com/sites/default/files/legacy/staff/lundberg_rolf_bio1011.pdf)); Isaac Arnsdorf, “More lobbyists on the transition,” *Politico* (November 11, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org>).



- [org/documents/3217279-2016-11-10-Transition-Team-List.html](https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rolf Lundberg” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 27 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael McKenna” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isasac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>).
- 28 Harris, Wiltshire, & Grannis, LLP, “Patricia J. Paoletta” (online at <https://www.hwglaw.com/team/patricia-j-paoletta/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Patricia Paoletta” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>).
- 29 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rebecca Rosen” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Rebecca Rosen,” LinkedIn (accessed June 27, 2017) (online at <https://www.linkedin.com/in/rebeccaarosen/>); Lee Fang, “Donald Trump’s Big Ethics Move is to Replace Lobbyists With Former Lobbyists,” *The Intercept* (November 22, 2016) (online at <https://theintercept.com/2016/11/22/trump-transition-lobbyists-2/>); Robin Vravender, “TRANSITION: Trump’s energy team overhauled,” *E&E News* (November 21, 2016) (online at <https://www.eenews.net/stories/1060046098>).
- 30 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael Torrey” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isasac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); Helena Bottemiller Evich, “Michael Torrey leading Trump agriculture transition effort,” *Politico* (November 9, 2016) (online at <http://www.politico.com/story/2016/11/michael-torrey-trump-agriculture-transition-231144>).
- 31 “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Martin Whitmer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 32 Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Byron Anderson” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 33 Al Shaw, Justin Elliot, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Clark Strategy Group, “Current and Past Clients” (online at <http://clarkstrategygroup.com/current-and-past-clients/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Timothy Clark” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Eisai, Inc., “Welcome to Eisai Inc.” (online at <http://us.eisai.com/>).
- 34 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jeffrey Gerrish” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 36 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jennifer Arangio” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Jennifer Arangio,” LinkedIn (accessed July 6, 2017) (online at <https://www.linkedin.com/in/jennifer-arangio-7969b85/>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>); “Perceptics” (online at <http://www.perceptics.com/>).

- 37 “Geoffrey Burr,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.LinkedIn.com/in/geoffrey-burr-71a4225/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Geoffrey Burr” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Justin Elliot, “Trump’s Watered-Down Ethics Rule Let a Lobbyist Help Run an Agency He Lobbied,” *ProPublica* (February 10, 2017) (online at <https://www.propublica.org/article/trump-watered-down-ethics-rules-let-lobbyist-help-run-agency-he-lobbied>).
- 38 “Jack Kalavritinos,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.LinkedIn.com/in/jack-kalavritinos-3a85294/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “J. Kalavritinos” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. FDA, “Meet Jack Kalavritinos, Associate Commissioner for External Affairs” (online at <https://www.fda.gov/AboutFDA/CentersOffices/ucm556585.htm>); Sheila Kaplan, “Trump taps longtime pharma lobbyist to help run FDA during transition,” *STAT News* (January 19, 2017) (online at <https://www.statnews.com/2017/01/19/fda-lobbyist-kalavritinos/>).
- 39 Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Sarah Makin” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); The White House, “Vice President Mike Pence Announces Andrea Thompson as National Security Advisor” (January 25, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/01/25/vice-president-mike-pence-announces-andrea-thompson-national-security>).
- 40 The White House, “President Donald J. Trump Announces Intended Appointments to the President’s Commission on White House Fellowships” (June 9, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/06/09/president-donald-j-trump-announces-intended-appointments-presidents>).
- 41 Carrie Levin, “Trump appointee is a Saudi government lobbyist,” *Center for Public Integrity* (June 22, 2017) (online at <https://www.publicintegrity.org/2017/06/22/20938/trump-appointee-saudi-government-lobbyist>).
- 42 Jeremy Diamond, “Donald Trump: Banks have ‘total control’ over Ted Cruz,” *CNN*, February 19, 2016, <http://www.cnn.com/2016/02/19/politics/donald-trump-ted-cruz-goldman-sachs/index.html>; Michelle Ruiz, “5 Things Donald Trump Attacked Hillary Clinton Over—But Is Currently Doing Himself,” *Vogue*, February 3, 2017, <http://www.vogue.com/article/donald-trump-hillary-clinton-five-attacks>.
- 43 “Trump Transition Team List and Assignments,” published by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Andrew Ackerman and Dave Michaels, “Donald Trump’s Point Man on Financial Regulation: A Former Regulator Who Favors a Light Touch,” *Wall Street Journal* (November 11, 2016) (online at <https://www.wsj.com/articles/donald-trumps-point-man-on-financial-regulation-a-former-regulator-who-favors-a-light-touch-1478860201>).
- 44 “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>).
- 45 “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jeff Eisenach” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 46 “Nancy Beck,” *LinkedIn* (accessed July 17, 2017) (online at <https://www.LinkedIn.com/in/nancybeck/>); Annie Snider and Alex Guillén, “EPA staffers, Trump official clashed over new chemical rules,” *Politico* (June 22, 2017) (online at <http://www.politico.com/story/2017/06/22/trump-epa-energy-chemicals-clash-239875>); American Chemistry Council, “About: Member Companies” (online at <https://www.americanchemistry.com/Membership/MemberCompanies/>).

- 47 Matt Egan, “Elizabeth Warren to Trump’s \$285 million Goldman Sachs man: Recuse yourself,” *CNN Money* (February 3, 2017) (online at <http://money.cnn.com/2017/02/03/investing/elizabeth-warren-gary-cohn-goldman-sachs-trump/index.html>).
- 48 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Commodity Markets Council, “Gregg Doud” (online at <http://www.commoditymkt.com/about-us/presidents-biography/>).
- 49 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Dave Ehrhart,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/dave-ehrhart-29a58710/>).
- 50 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Russ Choma, “Trump’s Economic Adviser Said the Economy Was Fine—Right Before It Imploded,” *Mother Jones* (August 5, 2016) (online at <http://www.motherjones.com/politics/2016/08/trump-economic-adviser-said-economy-fine-before-crash/>).
- 51 Eric Lipton, “Icahn Raises Ethics Flags With Dual Roles as Investor and Trump Advisor,” *New York Times* (March 26, 2017) (online at <https://www.nytimes.com/2017/03/26/us/politics/carl-icahn-trump-adviser-red-flags-ethics.html>).
- 52 Tamara Keith, “Trump’s Executive Order On Ethics Pull Word for Word from Obama, Clinton,” *NPR* (January 28, 2017) (online at <http://www.npr.org/2017/01/28/512201631/trumps-executive-order-on-ethics-pulls-word-for-word-from-obama-clinton>).
- 53 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “David Bernhardt” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “David Bernhardt,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/david-bernhardt-b9400711/>); Brownstein Hyatt Farber Schrek, “David Longly Bernhardt” (online at <http://www.bhfs.com/people/attorneys/a-b/dbernhardt>).
- 54 Theodor Meyer, “Boswell heads to Agriculture Department,” *Politico* (April 20, 2017) (online at <http://www.politico.com/tipsheets/politico-influence/2017/04/boswell-heads-to-agriculture-department-219888>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Kristi Boswell” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); John Binder, “Pro-labor Outsourcing Lobbyist Joins Trump’s Agriculture Department,” *Breitbart* (April 23, 2017) (online at <http://www.breitbart.com/texas/2017/04/23/pro-labor-outsourcing-lobbyist-joins-trumps-agriculture-dept/>).
- 55 Emily Stephenson and Dustin Volz, “Trump packs transition team with Washington veterans, review shows,” *Reuters* (December 1, 2016) (online at <http://www.reuters.com/article/us-usa-trump-teams-idUSKBN13Q5MR>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Nova Daly” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Wiley Rein, LLP, “Nova J. Daly” (online at <http://www.wileyrein.com/professionals-NovaDaly.html>).
- 56 Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Makan Delrahim” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).
- 57 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Taylor Hansen” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Annie Waldman, “With For-Profit Colleges Quits Education Department,” *ProPublica* (March 21, 2017) (online at <https://www.propublica.org/article/former-lobbyist-with-for-profit-colleges-quits-education-department>).
- 58 Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Nathan Miller” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

- 59 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Tara Bradshaw” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Nancy Cook, “Trump’s Sherpas,” *Politico* (December 26, 2016) (online at <http://www.politico.com/story/2016/12/trump-cabinet-picks-nomination-sherpas-232941>).
- 60 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael Catanzaro” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Counsel to the President, “Memorandum for Michael Catanzaro, Special Assistant to the President,” The White House (released on May 31, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/MICHAEL%20CATANZARO.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Megan R. Wilson, “Lobbyists finding spots in Trump administration,” *The Hill* (March 15, 2017) (online at <http://thehill.com/business-a-lobbying/324195-more-lobbyists-finding-spots-in-trump-administration>); Andrew Restuccia and Isaac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>).
- 61 Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Ben Brody, “Senior White House Advisor Departs for Business Lobby Group,” *Bloomberg* (April 12, 2017) (online at <https://www.bloomberg.com/news/articles/2017-04-12/senior-white-house-adviser-departs-for-business-lobbying-group>).
- 62 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Shahira Knight” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Counsel to the President, “Memorandum for Shahira Knight, Special Assistant to the President,” The White House (released on May 31, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/SHAHIRA%20KNIGHT.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); Eric Lipton, Ben Protess, and Andrew W. Lehren, “With Trump Appointees, a Raft of Potential Conflicts and ‘No Transparency,’” *New York Times* (April 15, 2017) (online at <https://www.nytimes.com/2017/04/15/us/politics/trump-appointees-potential-conflicts.html>).
- 63 Counsel to the President, “Memorandum for Andrew Olmem, Special Assistant to the President,” The White House (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/ANDREW%20OLMEM.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Andrew Olmem” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); David Dayen, “Trump Just Set His Lobbying Rules On Fire,” *The Nation* (Jun. 1, 2017) (online at <https://www.thenation.com/article/trump-just-set-lobbying-rules-fire/>).
- 64 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Joshua Pitcock” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isaac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); Office of Government Ethics, “Certain agency records received in response to PA-17-02” (released June 7, 2017) (online at <https://www.oge.gov/web/OGE.nsf/0/67460009B646BBF88525813800566276/%24FILE/Certain%20agency%20records%20recd%20in%20response%20to%20PA-17-02.pdf>); Maggie Haberman, “Pence to Replace His Chief of Staff,” *New York Times* (June 19, 2017) (online at <https://www.nytimes.com/2017/06/29/us/politics/mike-pence-josh-pitcock-chief-of-staff.html?rref=collection%2Fsectioncollection%2Fpolitics&r=0>).
- 65 McGuireWoods Consulting, “Robert Wasinger Joins Federal Government Relations Team” (February 15, 2017) (online at <http://www.mwcllc.com/ideas/news/2017/2/robert-wasinger-joins-federal-government-relations-team.aspx>); Matea Gold, “A former Trump administration appointee who left without signing ethics pledge is now a lobbyist,” *Washington Post* (March 29, 2017) (online at [https://www.washingtonpost.com/news/post-politics/wp/2017/03/29/a-former-trump-administration-appointee-who-left-without-signing-ethics-pledge-is-now-a-lobbyist/?utm\\_term=.21757cdb51a8](https://www.washingtonpost.com/news/post-politics/wp/2017/03/29/a-former-trump-administration-appointee-who-left-without-signing-ethics-pledge-is-now-a-lobbyist/?utm_term=.21757cdb51a8)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Wasinger” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 66 Theodoric Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3,

2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>).

- 67 Theodor Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Mason” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 68 U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Lauren Maddox” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Theodor Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); The Podesta Group, “Lauren Maddox: Principal” (online at <http://www.podesta.com/talent/lauren-maddox>); Alyson Klein, “Former Bush Staffers Helping Out With Trump’s Education Transition,” *Education Week* (December 15, 2016) (online at [http://blogs.edweek.org/edweek/campaign-k-12/2016/12/former\\_bush\\_staffers\\_helping\\_o.html](http://blogs.edweek.org/edweek/campaign-k-12/2016/12/former_bush_staffers_helping_o.html)); David Halperin, “Who’s Lobbying For For-Profit Colleges In the Trump-DeVos Era?” *Huffington Post* (June 28, 2017) (online at [http://www.huffingtonpost.com/entry/whos-lobbying-for-for-profit-colleges-in-the-trump\\_us\\_5953cef6e4b0c85b96c65e53?ncid=engmodushpmg00000004](http://www.huffingtonpost.com/entry/whos-lobbying-for-for-profit-colleges-in-the-trump_us_5953cef6e4b0c85b96c65e53?ncid=engmodushpmg00000004)); David Halperin, “DeVos Declines To Support For-Profit College Accountability Rules,” *Huffington Post* (January 17, 2017) (online at [http://www.huffingtonpost.com/davidhalperin/devos-declines-to-support\\_b\\_14235348.html](http://www.huffingtonpost.com/davidhalperin/devos-declines-to-support_b_14235348.html)).
- 69 Theodor Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Sweeney” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 70 Joseph Walker, “Trump Attacks Drugmakers on Pricing,” *Wall Street Journal* (January 11, 2017) (online at <https://www.wsj.com/articles/trump-attacks-drugmakers-on-pricing-1484167641?mod=e2fb>).
- 71 Joseph Walker, “Trump Attacks Drugmakers on Pricing,” *Wall Street Journal* (January 11, 2017) (online at <https://www.wsj.com/articles/trump-attacks-drugmakers-on-pricing-1484167641?mod=e2fb>); Lydia Ramsey, “trump says he wants to tackle drug pricing in the GOP’s Obamacare replacement plan,” *Business Insider* (March 21, 2017) (online at <http://www.businessinsider.com/trump-wants-drug-pricing-added-to-ahca-2017-3>).
- 72 Jared S. Hopkins, “Trump Sends Pharma Stocks Down With New Tweet on Drug Prices,” *Bloomberg* (March 7, 2017) (online at <https://www.bloomberg.com/news/articles/2017-03-07/trump-sends-pharma-stocks-down-with-new-tweet-on-drug-prices>); Lydia Ramsey, “trump says he wants to tackle drug pricing in the GOP’s Obamacare replacement plan,” *Business Insider* (March 21, 2017) (online at <http://www.businessinsider.com/trump-wants-drug-pricing-added-to-ahca-2017-3>); Ed Kilgore, “Trump Meets with Pharma CEOs, Immediately Flips to Industry-Friendly Position on Drug Prices,” *New York Magazine* (January 31, 2017) (online at <http://nymag.com/daily/intelligencer/2017/01/trump-seems-to-flip-flop-on-drug-prices-after-pharma-meeting.html>).
- 73 Emily Kopp, “Exclusive: White House task force echoes pharma proposals,” *STAT* (June 16, 2017) (online at <https://www.statnews.com/2017/06/16/white-house-drug-prices/>); Katie Thomas, “F.D.A. Nominee, Paid Millions by Industry, Says He’ll Recuse Himself if Needed,” *New York Times* (March 29, 2017) (online at <https://www.nytimes.com/2017/03/29/health/fda-nominee-scott-gottlieb-recuse-conflicts.html>).
- 74 Sheila Kaplan and Katie Thomas, “Draft Order on Drug Prices Proposes Easing Regulations,” *New York Times* (June 20, 2017) (online at <https://www.nytimes.com/2017/06/20/health/draft-order-on-drug-prices-proposes-easing-regulations.html>).
- 75 *Id.*
- 76 Sarah Karlin-Smith, “Trump’s drug price ‘remedy’ expected to be industry friendly,” *Politico* (June 16, 2017) (online at <http://www.politico.com/story/2017/06/16/trump-drug-prices-industry-239659>); Emily Kopp, “Exclusive: White House task force echoes pharma proposals,” *STAT* (June 16, 2017) (online at <https://www.statnews.com/2017/06/16/white-house-drug-prices/>).
- 77 Emily Kopp, “Documents shed light on Trump’s Drug Pricing and Innovation Working Group,” *MedCity News* (June 91, 2017) (online at <http://medcitynews.com/2017/06/trumps-drug-pricing-and-innovation-working-group-discussions/?rf=1>).
- 78 Associated Builders and Contractors, Inc., “About ABC” (online at <http://www.abc.org/en-us/abc/aboutabc.aspx>); Barry Meier and Danielle Ivory, “Under Trump, Worker Protections Are Viewed With New Skepticism,” *New York Times* (June 5, 2017) (online at <https://www.nytimes.com/2017/06/05/business/under-trump-worker-protections-are-viewed-with-new-skepticism.html>).
- 79 Barry Meier and Danielle Ivory, “Under Trump, Worker Protections Are Viewed With New Skepticism,” *New York Times* (June

- 5, 2017) (online at <https://www.nytimes.com/2017/06/05/business/under-trump-worker-protections-are-viewed-with-new-skepticism.html>).
- 80 Barry Meier and Danielle Ivory, “Under Trump, Worker Protections Are Viewed With New Skepticism,” *New York Times* (June 5, 2017) (online at <https://www.nytimes.com/2017/06/05/business/under-trump-worker-protections-are-viewed-with-new-skepticism.html>).
- 81 Patricia Cohen, “Betsy DeVos’s Hiring of For-Profit College Official Raises Impartiality Issues,” *New York Times* (March 17, 2017) (online at <https://www.nytimes.com/2017/03/17/business/education-for-profit-robert-eitel.html>); Annie Waldman, “Former Lobbyist With For-Profit Colleges Quits Education Department,” *ProPublica* (March 21, 2017) (online at <https://www.propublica.org/article/former-lobbyist-with-for-profit-colleges-quits-education-department>).
- 82 Patricia Cohen, “Betsy DeVos’s Hiring of For-Profit College Official Raises Impartiality Issues,” *New York Times* (March 17, 2017) (online at <https://www.nytimes.com/2017/03/17/business/education-for-profit-robert-eitel.html>);
- “Form 10-K.” Bridgepoint Education, Inc. United States Securities and Exchange Commission (March 7, 20 17) (online at <http://d18m0p25nwr6d.cloudfront.net/CIK-0001305323/c9270e18-c8d7-4d2a-902e-622ce040a8dc.pdf>).
- 83 Lydia Wheeler, “DeVos to redo two Obama-era rules on for-profit schools,” *The Hill* (June 14, 2017) (online at <http://thehill.com/regulation/other/337834-devos-to-redo-two-obama-era-rules-on-for-profit-schools>).
- 84 Lydia Wheeler, “DeVos to redo two Obama-era rules on for-profit schools,” *The Hill* (June 14, 2017) (online at <http://thehill.com/regulation/other/337834-devos-to-redo-two-obama-era-rules-on-for-profit-schools>); U.S. Department of Education, “U.S. Department of Education Announces Final Regulations to Protect Students and Taxpayers from Predatory Institutions” (October 28, 2016) (online at <https://www.ed.gov/news/press-releases/us-department-education-announces-final-regulations-protect-students-and-taxpayers-predatory-institutions>).
- 85 ProPublica, “Trump admin hired ANOTHER lobbyist to work at an agency whose regulations he once fought,” *Facebook* (February 17, 2017) (online at <https://www.facebook.com/notes/propublica/trump-admin-hired-another-lobbyist-to-work-at-an-agency-whose-regulations-he-once-fought/10155123953299445>); Eric Lipton, Ben Protess, and Andrew Lehren, “With Trump Appointees, a Raft of Potential Conflicts and No Transparency,” *New York Times* (April 15, 2017) (online at [https://www.nytimes.com/2017/04/15/us/politics/trump-appointees-potential-conflicts.html?\\_r=0](https://www.nytimes.com/2017/04/15/us/politics/trump-appointees-potential-conflicts.html?_r=0)); The White House, “White House National Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Byron Anderson” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 86 Ashlea Ebeling, “DOL Officially Delays Fiduciary Rule Until June 9, At Least,” *Forbes* (April 5, 2017) (online at <https://www.forbes.com/sites/ashlaeabeling/2017/04/05/dol-officially-delays-fiduciary-rule-until-june-9-at-least/#3e87af718809>).
- 87 Ashlea Ebeling, “DOL Officially Delays Fiduciary Rule Until June 9, At Least,” *Forbes* (April 5, 2017) (online at <https://www.forbes.com/sites/ashlaeabeling/2017/04/05/dol-officially-delays-fiduciary-rule-until-june-9-at-least/#3e87af718809>); Kenneth Corbin, “SEC chairman promises action on fiduciary rule,” *Financial Planning* (June 27, 2017) (online at <https://www.financial-planning.com/news/sec-chairman-promises-action-on-fiduciary-rule>); Eric Lipton, Ben Protess, and Andrew W. Lehren, “With Trump Appointees, a Raft of Potential Conflicts and ‘No Transparency,’” *New York Times* (April 15, 2017) (online at <https://www.nytimes.com/2017/04/15/us/politics/trump-appointees-potential-conflicts.html>); The White House, “Presidential Memorandum on Fiduciary Duty Rule (February 3, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/03/presidential-memorandum-fiduciary-duty-rule>); Chris Arnold, “Trump Moving to Delay Rule That Protects Workers From Bad Financial Advice,” *NPR* (February 17, 2017) (online at <http://www.npr.org/2017/02/17/515631485/trump-moving-to-delay-rule-that-protects-workers-from-bad-financial-advice>).
- 88 “Nancy Beck,” *LinkedIn* (accessed July 17, 2017) (online at <https://www.Linkedin.com/in/nancybbeck/>); Annie Snider and Alex Guillén, “EPA staffers, Trump official clashed over new chemical rules,” *Politico* (June 22, 2017) (online at <http://www.politico.com/story/2017/06/22/trump-epa-energy-chemicals-clash-239875>); American Chemistry Council, “About: Member Companies” (online at <https://www.americanchemistry.com/Membership/MemberCompanies/>).
- 89 Senator Whitehouse, “Whitehouse, Merkley Ask How EPA Appointee Could Possibly Do Her Job Given Extensive Ethics Conflicts” (May 16, 2017) (online at <https://www.whitehouse.senate.gov/news/release/whitehouse-merkley-ask-how-epa-appointee-could-possibly-do-her-job-given-extensive-ethics-conflicts>); Natasha GEiling, “Trump’s new EPA appointee violates

- his own ethics order, senators say,” *ThinkProgress* (May 17, 2017) (online at <https://thinkprogress.org/epa-appointee-ethics-order-bennett-b3688b456823>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Tate Bennett” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- 90** Tom DiChristopher, “Trump signs executive order to roll back Obama-era climate actions, power plan emissions rule,” *CNBC* (March 28, 2017) (online at <http://www.cnbc.com/2017/03/27/trump-to-roll-back-obama-climate-actions-power-plant-emissions-rule.html>).
- 91** The White House, “Presidential Executive Order on Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the ‘Waters of the United States’ Rule” (February 28, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/28/presidential-executive-order-restoring-rule-law-federalism-and-economic>); Gabrielle Bluestone, “Trump takes steps to ensure more Americans have access to unsafe drinking water,” *Vice News* (June 27, 2017) (online at <https://news.vice.com/story/trump-takes-steps-to-ensure-more-americans-have-access-to-polluted-water>); Environmental Protection Agency, “Definitions of ‘Waters of the United States’—Recodification of Pre-existing Rules” (online at [https://www.epa.gov/sites/production/files/2017-06/documents/wotus\\_prepublication\\_version.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/wotus_prepublication_version.pdf)).
- 92** Carl Surran, “Big Oil praises Trump victory, expects less red tape,” *Seeking Alpha* (November 9, 2016) (online at <https://seekingalpha.com/news/3222868-big-oil-praises-trump-victory-expects-less-red-tape>).
- 93** Damian Paletta, “Trump picks another Goldman banker for senior post, in sharp break from campaign bashing,” *Washington Post* (March 14, 2017) (online at [https://www.washingtonpost.com/news/wonk/wp/2017/03/14/trump-picks-another-goldman-banker-for-senior-post-in-sharp-break-from-campaign-bashing/?utm\\_term=.6db48c20029d](https://www.washingtonpost.com/news/wonk/wp/2017/03/14/trump-picks-another-goldman-banker-for-senior-post-in-sharp-break-from-campaign-bashing/?utm_term=.6db48c20029d)).
- 94** Benn Protes and Julie Hirschfeld Davis, “Trump Moves to Roll Back Obama-Era Financial Regulations,” *New York Times* (February 3, 2017) (online at <https://www.nytimes.com/2017/02/03/business/dealbook/trump-congress-financial-regulations.html>).
- 95** Alexander Mallin, “Trump signs executive actions to review tax regulations, roll back Dodd-Frank,” *ABC News* (April 21, 2017) (online at <http://abcnews.go.com/Politics/trump-sign-executive-actions-review-tax-regulations-roll/story?id=46938451>).
- 96** Alan Rappeport, “Bill to Erase Some Dodd-Frank Banking Rules Passes in House,” *New York Times* (June 8, 2017) (online at <https://www.nytimes.com/2017/06/08/business/dealbook/house-financial-regulations-dodd-frank.html>).
- 97** Donald J. Trump, “Tax Reform That Will Make America Great Again” (online at <https://assets.donaldjtrump.com/trump-tax-reform.pdf>).

**Appendix I**  
**Lobbyists in the Trump Administration (2015-2017)**  
**Last Updated: 7.11.17**

°Indicates that the lobbyist has lobbied the agency that they worked on during the Trump Transition, or where they now work, within 2015-2017, based on U.S. Senate Lobbying Disclosure Act Database filings.

First Name	Last Name	Administration Position	Agency	Organization	Description
<b>Rebeckah</b>	<b>Adcock</b> <sup>°</sup>	Senior Advisor	Agriculture	CropLife America	Former Senior Director of Government Affairs at CropLife America, a “trade association for pesticide makers.” At CropLife, Adcock lobbied the Department of Agriculture on reducing regulatory burdens. <sup>1</sup>
<b>Jennifer</b>	<b>Arangio</b>	Senior Director*	National Security Council	Command Group	As a Principal at the Command Group, Arangio lobbied on Homeland Security issues for Perceptics LLC, a “high performance imaging” company with a focus on border security.  *Also served as a Transition Team Member for the National Security Council. <sup>2</sup>
<b>Bud</b>	<b>Albright</b>	Housing and Urban Development Lead, Agency Task Force	Transition Team	Ogilvy Government Relations	Lobbyist at Ogilvy, whose clients include the National Association of Water Companies, the American Power Group, and MoneyGram. <sup>3</sup>
<b>Byron</b>	<b>Anderson</b>	Special Assistant to the Secretary	Labor	Transamerica	Served as the Vice President of Federal Affairs at insurance and financial services company Transamerica since 2006, where he lobbied against financial regulations. <sup>4</sup>
<b>George David</b>	<b>Banks</b>	Special Assistant to the President for International Energy and Environment	National Economic Council	American Council for Capital Formation	Served as an Executive Vice President and lobbyist for the American Council for Capital Formation, a business group that has opposed environmental regulations. <sup>5</sup>



First Name	Last Name	Administration Position	Agency	Organization	Description
<b>Peter</b>	<b>Barrett</b>	Senior White House Advisor*	U.S. Trade and Development Agency	National Association of State Treasurers	Former lobbyist for the National Association of State Treasurers who lobbied Congress, the Treasury Department, the SEC, and the White House on securities and banking laws.  *Also worked on the National Credit Union Administration Team for the Trump Transition. <sup>6</sup>
<b>John</b>	<b>Bartrum</b>	(Nominee) Assistant Secretary of Financial Resources	HHS	Squire Patton Boggs	Lobbyist at Squire Patton Boggs who has lobbied as recently as 2017. <sup>7</sup>
<b>Erika</b>	<b>Baum</b>	Executive Assistant to the Secretary	Transportation	General Mills	Worked as a General Mills lobbyist from 2009-2016. <sup>8</sup>
<b>Elizabeth (“Tate”)</b>	<b>Bennett</b>	Deputy Associate Administrator, Office of Congressional and Intergovernmental Relations	EPA	National Rural Electric Cooperative Association	Former lobbyist for the National Rural Electric Cooperative Association (NRECA), where she lobbied on EPA issues. NRECA opposes many EPA regulations and has formally commented on dozens of them. <sup>9</sup>
<b>David</b>	<b>Bernhardt</b> <sup>o</sup>	(Nominee) Deputy Secretary*	Interior	Brownstein Hyatt Farber Schreck	Head of the Natural Resources Practice at Brownstein Hyatt Farber Schreck whose lobbying clients include the Rosemont Copper Company.  *Also served as the Interior Department lead for the Domestic Issues Agency Action Team during the Trump Transition. <sup>10</sup>
<b>Kristi</b>	<b>Boswell</b> <sup>o</sup>	Senior Advisor to the Secretary	Agriculture	American Farm Bureau Federation	Director of Congressional Relations and lobbyist at the American Farm Bureau Federation, an organization that has promoted the H-2B visa program. <sup>11</sup>
<b>Tara</b>	<b>Bradshaw</b> <sup>o</sup>	Confirmation Lead for then-nominee Steve Mnuchin	Transition Team	Ernst & Young	Lobbyist whose client list includes, Mars Inc., New York Life Insurance Corporation, and Met Life. <sup>12</sup>

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<b>Geoffrey</b>	<b>Burr</b>	Chief of Staff*	Transportation	Associated Builders and Contractors	Served until September 2015 as the Vice President of Government Affairs at Associated Builders and Contractors.  *From January 2017 to April 2017, served as the Special Assistant to the Secretary at Department of Labor. Served as the "Confirmation Lead" for Transportation Secretary Elaine Chao during the Trump Transition. <sup>13</sup>
<b>Steve</b>	<b>Buyer</b>	Department of Veterans Affairs Team Member	Transition Team	Steve Buyer Group	Lobbied on behalf of Huron Consulting, the Laboratory Corporation of America, and the RAI Services Company, the parent company of the RJ Reynolds Tobacco Company. Buyer is a former Member of Congress who declined to seek reelection "amid [an] ethics probe." <sup>14</sup>
<b>Alexandra</b>	<b>Campau</b>	Special Assistant to the President for Health Policy	White House Office	Cozen O'Connor	While working as a Healthcare Associate at Cozen O'Connor from 2012 to 2015, Campau's lobbying clients included Independent Blue Cross and Beachbody. Campau served as a Special Assistant at HHS prior to her role at the White House. <sup>15</sup>
<b>James</b>	<b>Carroll</b> <sup>o</sup>	Special Assistant to the President and Senior Counsel	White House Office	Ford Motor Company	Lobbied on behalf of Ford from 2014 to 2017. <sup>16</sup>
<b>Jim</b>	<b>Carter</b>	Tax Reform Lead, Policy Implementation Team	Transition Team	Emerson	An in-house lobbyist for Emerson, a global manufacturing company who de-registered as a lobbyist in November 2016. Carter is also a former advisor to Vladimir Putin. <sup>17</sup>
<b>Thomas</b>	<b>Carter</b> <sup>o</sup>	Department of Defense, Landing Team Member	Transition Team	Elbit Systems of America	Served as a lobbyist and the Vice President for Government Relations at defense contractor Elbit Systems of America until October 2015. Since retiring from Elbit Systems, Carter has continued to work as a national security consultant. <sup>18</sup>

First Name	Last Name	Administration Position	Agency	Organization	Description
<b>Michael</b>	<b>Catanzaro</b>	Special Assistant to the President for Domestic Energy and Environmental Policy*	National Economic Council	CGCN Group	<p>Catanzaro worked as a Partner at the lobbying firm CGCN Group, where he represented energy groups and companies like the American Fuel and Petrochemical Manufacturers, Devon Energy, and Encana Oil and Gas as recently as 2017. The White House granted Catanzaro a waiver from President Trump's Ethics Pledge to allow him to work on energy policy at the NEC.</p> <p>*Also served on the Trump Transition as part of the Energy Independence Team, but resigned his position amid scrutiny of lobbyists on the Transition Team.<sup>19</sup></p>
<b>Robert</b>	<b>Charrow</b>	(Nominee) General Counsel	HHS	Greenberg Traurig	A shareholder at Greenberg Traurig who recently represented Intrexon Corporation, a biotech company. <sup>20</sup>
<b>Timothy</b>	<b>Clark</b>	White House Liaison	HHS	Clark Strategy Group	Ran his own political consulting company, whose clients include the Pharmaceutical Research and Manufacturers of America. <sup>1</sup>
<b>Mauricio</b>	<b>Claver-Carone</b>	Advisor*	Treasury	Cuba Democracy Public Advocacy Corporation	<p>Lobbied on behalf of Cuba Democracy Advocates in opposition to alleviating sanctions on the Cuban government and in support of pro-democracy forces in Cuba.</p> <p>*Also served on the Trump Transition Team for the Department of Treasury.<sup>22</sup></p>
<b>Lisa Marie</b>	<b>Cheney</b>	National Security Council Team Member	Transition Team	Ervin Hill Strategy	At Ervin Hill Strategy, a government relations and public affairs firm, Cheney lobbied on behalf of Aerojet Rocketdyne, General Dynamics, and Northrup Grumman. <sup>23</sup>
<b>Robert</b>	<b>Collins</b>	Personnel Lead	Transition Team	S-3 Group	At the S-3 group, a government relations and public affairs firm, Collins's lobbying clients include Google,

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					J.P. Morgan, and the Securities Industry and Financial Markets Association.  *Collins also served as “a strategic adviser to the White House” during the confirmation process of Supreme Court Justice Neil Gorsuch. <sup>24</sup>
<b>Earl</b>	<b>Comstock</b>	Director of the Office of Policy and Strategic Planning*	Commerce	Eckert Seamans Cherin and Mellott	Worked as a lobbyist at Eckert Seamans Cherin and Mellott until 2015, where he represented Swiss Airlines and the Real-Time Technology Group. Immediately prior to joining the Trump Administration, Comstock served as the General Counsel at tech start-up VTCSecure LLC.  *Also served as a Confirmation Lead for Commerce Secretary Wilbur Ross during the Trump Transition. <sup>25</sup>
<b>Mark</b>	<b>Cowan</b>	Department of Labor Team Member	Transition Team	Potomac International Partners	The CEO and Founder of Cowan Strategies, Cowan recently registered as a lobbyist for Potomac International Partners (PIP). Cowan is also the CEO and founder of PIP. <sup>26</sup>
<b>Nova</b>	<b>Daly</b> <sup>o</sup>	Landing Team Member for the Office of the U.S. Trade Representative	Transition Team	Wiley Rein	Lobbyist for steel maker Nucor, Century Aluminum, and Solarworld Industries. Daly claimed to have “terminated all his lobbying activity” while working on the Transition Team, but official filings show that Daly lobbied for Nucor, Century, and Solarworld in the fourth quarter of 2016 and/or the first quarter of 2017. <sup>27</sup>
<b>Makan</b>	<b>Delrahim</b> <sup>o</sup>	(Nominee) Assistant Attorney General for the Antitrust Division*	Justice	Brownstein Hyatt Farber Schreck	At Brownstein, Delrahim lobbied on behalf of health insurer Anthem, the Independent Directors of the Board of Directors of Wells Fargo, pharmaceutical giant Pfizer, and Qualcomm, among other clients.  *Currently serves as the Deputy Counsel to the President for Nominations and Oversight. <sup>28</sup>

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<b>Mark</b>	<b>Esper</b> <sup>o</sup>	(Nominee) Secretary of the Army	Defense	Raytheon	The current Vice President of Government Relations at Raytheon, Esper has lobbied the Department of Defense, the National Security Agency, and the Department of Homeland Security on military acquisition policy. <sup>29</sup>
<b>Mike</b>	<b>Ference</b>	Energy Independence Team	Transition Team	S-3 Group	Lobbyist at the S-3 Group whose clients include General Motors, JP Morgan, and Boeing, among others. <sup>30</sup>
<b>Alex</b>	<b>Flint</b>	Confirmation Lead for Ryan Zinke, nominee for Secretary of the Interior	Transition Team	Nuclear Energy Institute	Lobbied in 2016 for the Nuclear Energy Institute. Currently serves as a board member of the Keystone Energy Board, and as executive director of Alliance for Market Solutions, which advocates repealing carbon regulations in favor of a carbon tax. <sup>31</sup>
<b>Michael</b>	<b>Flynn</b>	Former National Security Advisor*	Executive Office of the President / National Security Council		Flynn received \$600,000 in lobbying fees from Ekim Alptekin, a Turkish citizen with “business ties to Russia.” <sup>32</sup>  *Also served as a Vice Chair of the Trump Transition.
<b>Jeffrey</b>	<b>Gerrish</b> <sup>o</sup>	(Nominee) Deputy U.S. Trade Representative for Asia, Europe, and the Middle East, and Industrial Competitiveness	U.S. Trade Representative	Skadden, Arps, Slate, Meagher, & Flom	Head of the International Trade Group at Skadden Arps, where he lobbied on behalf of U.S. Steel. <sup>33</sup>
<b>William</b>	<b>Greene</b>	Assistant to the Secretary	Energy	Safari Club International	Lobbyist for Safari Club International, an organization devoted to hunter's rights. <sup>34</sup>
<b>Joseph</b>	<b>Grogan</b> <sup>o</sup>	Associate Director of Health Programs*	OMB	Gilead Sciences	Lobbied as recently as 2017 for Gilead Sciences, a biopharmaceutical company infamous for pricing its drugs for Hepatitis C at \$1,000 a pill.  *Also leads President Trump's Drug Pricing and Innovation Working Group. <sup>35</sup>

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<b>Taylor</b>	<b>Hansen</b> <sup>o</sup>	Special Assistant to the Secretary	Education	Association of Private Sector Colleges and Universities	Worked in 2016 as a lobbyist for the Association of Private Sector Colleges and Universities, an advocacy organization representing for-profit universities. Hansen resigned from his position at the Education Department in March 2017 after Senator Warren raised ethics concerns. <sup>36</sup>
<b>Steve</b>	<b>Hart</b>	Labor Lead, Domestic Issues Agency Action Team	Transition Team	Williams & Jensen PLLC	A "top lobbyist" in D.C. whose firm represents General Electric, Coca Cola, Pfizer, and Visa. <sup>37</sup>
<b>Cindy</b>	<b>Hayden</b>	Department of Homeland Security Lead, National Security Agency Action Team	Transition Team	Altria	A lobbyist for tobacco company Altria. <sup>38</sup>
<b>Bradley</b>	<b>Hayes</b>	Advisor, Office of Policy	DHS	Chamber of Commerce	Former Executive Director of Congressional and Public Affairs at the U.S. Chamber of Commerce, where he lobbied Congress regarding Homeland Security issues. <sup>39</sup>
<b>Christopher</b>	<b>Hess</b>	Special Advisor	Transportation	Eaton Corporation	Former Director of Public Affairs for the Eaton Corporation, where he lobbied on tax, energy, and vehicle technology issues as recently as 2017. <sup>40</sup>
<b>Richard</b>	<b>Hohlt</b>	Member, Commission on White House Fellowships	Executive Office of the President	Saudi Arabia	Has received over \$400,000 since January 2017 to lobby on behalf of the Saudi Arabian foreign ministry. President Trump issued a lifetime ban on Executive Branch employees serving as lobbyists for foreign governments. <sup>41</sup>
<b>Jack</b>	<b>Kalavritinos</b>	Associate Commissioner for External Affairs for the Food and Drug Administration (FDA)*	HHS	Covidien	Until 2015, was a registered lobbyist and Director of Government Affairs for Covidien, a pharmaceutical company.  *Also served on the Transition Team as the lead staffer for Department of Education appointments and a Special

First Name	Last Name	Administration Position	Agency	Organization	Description
					Assistant in the Office of the Secretary at HHS in the early days of the Administration. <sup>42</sup>
<b>Gilbert</b>	<b>Kaplan</b> <sup>o</sup>	(Nominee) Undersecretary of International Trade	Commerce	King & Spalding	Partner in the International Trade Practice Group at King & Spalding who has lobbied on behalf of Appvion Inc. (formerly known as Appleton Papers Inc.) on issues related to paper imports, and Zekelman Industries (formerly known as the JMC Steel Group) on steel trade issues. <sup>43</sup>
<b>Julie</b>	<b>Kirchner</b>	Citizen and Immigration Services Ombudsman	Homeland Security	Federation for American Immigration Reform	Served as the Director of Federation for American Immigration Reform until 2015, where she lobbied on behalf of anti-immigrant policies. <sup>44</sup>
<b>Shahira</b>	<b>Knight</b> <sup>o</sup>	Special Assistant to the President for Tax and Retirement Policy	National Economic Council	Fidelity Investments	While serving as a Vice President at Fidelity, Knight lobbied the government on a variety of tax and retirement matters, including in opposition to the "fiduciary rule." The White House granted Knight a waiver from President Trump's Ethics Pledge that allows her to work on these matters at the NEC. <sup>45</sup>
<b>Shawn</b>	<b>Krause</b> <sup>o</sup>	Department of Housing and Urban Development Team Member	Transition Team	Quicken Loans	Lobbyist for Quicken Loans, Inc., who lobbied HUD as recently as 2016 on behalf of the mortgage lender. <sup>46</sup>
<b>Peter</b>	<b>Krug</b>	Associate Director of Intergovernmental Affairs	Commerce	Hamilton Station Consulting	Former Principal at Hamilton Station Consulting, where he lobbied on behalf of the American Optometric Association. <sup>47</sup>
<b>Bryan</b>	<b>Lanza</b>	Deputy Communications Director	Transition Team	Mercury	Former member of the Trump Transition Team who joined Mercury, a consulting firm, in February 2017, and began work for them as a lobbyist in June 2017. <sup>48</sup>
<b>Russell</b>	<b>Laird</b>	Special Assistant*	Agriculture	National Rural Utilities	Served as the Vice President of Federal Relations at the National Rural Utilities Cooperative Finance Corporation from 2011 to 2016 and lobbied on issues affecting rural

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				Cooperative Finance Corporation	infrastructure projects.  *Also served as a Landing Team Member at the Department of Agriculture during the Trump Transition. <sup>49</sup>
<b>Lance</b>	<b>Leggitt</b>	Chief of Staff for Secretary Tom Price	HHS	Baker, Donelson, Bearman, Caldwell & Berkowitz	Former Chair of the Federal Health Policy Practice at lobbying firm Baker Donelson. In 2016, Leggitt represented multiple medical supply companies, including Arriva Medical and CCS Medical. Leggitt received a waiver to allow him to “participate in the specific issue areas in which particular matters on which he lobbied fall.” <sup>50</sup>
<b>Keagan</b>	<b>Lenihan</b>	Senior Advisor to the Secretary	HHS	McKesson Specialty Health	Former Senior Director of Government Relations and lobbyist at McKesson Specialty Health. While at McKesson, Lenihan lobbied on healthcare policy issues. <sup>51</sup>
<b>Rolf</b>	<b>Lundberg</b>	Trade Reform Lead, Policy Implementation Team	Transition Team	Choice Hotels International; The Lundberg Group	Former Senior Vice President for Congressional and Public Affairs at the U.S. Chamber of Commerce and current lobbyist who represents corporate clients like Choice Hotels International and the International Franchise Association. <sup>52</sup>
<b>Ado</b>	<b>Machida</b>	Policy Implementation Director	Transition Team	Navigators Global	Took a lobbying position at Navigators Global after serving on the Trump Transition Team. Clients include Microsoft, AT&T, and Oracle. <sup>53</sup>
<b>Mark</b>	<b>Maddox</b> <sup>o</sup>	Assistant to the Secretary*	Energy	The Livingston Group/Maddox Strategies	While a Consultant at The Livingston Group and Maddox Strategies, Maddox lobbied on behalf of General Synfuels International and Noranda Aluminum.  *Also served on the Energy Department Landing Team for the Trump Transition. <sup>54</sup>



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<b>Lauren</b>	<b>Maddox</b> <sup>o</sup>	Education Communications Advisor	Transition Team	The Podesta Group	Works as an education policy lobbyist at The Podesta Group and advised the Trump Transition team on education-related communications. Maddox “registered as a lobbyist for the Podesta Group days after Trump was sworn into office.” <sup>55</sup>
<b>Sarah</b>	<b>Makin</b>	Deputy Assistant to the President and Director of Public Engagement and Intergovernmental Affairs for the Vice President*	Office of the Vice President	Wise Public Affairs	From 2014 to 2016, lobbied at Wise Public Affairs on behalf of the U.S. Consumer Coalition on issues related to reform of the CFPB.  *Also served as the Scheduler to the Vice President-Elect on the Trump Transition Team. <sup>56</sup>
<b>Michael</b>	<b>Marshall</b>	Deputy Director of Correspondence and Director of Writers	White House Office	Marshall Consulting	Former President of Marshall Consulting until 2017. Marshall lobbied on behalf of Spectrum Five LLC, a satellite company, in 2014 and 2015. <sup>57</sup>
<b>Scott</b>	<b>Mason</b>	Director of Congressional Relations	Transition Team	Lowe’s Companies; Holland & Knight	A lobbyist for Lowe’s who left the Transition for Holland & Knight in January 2017. Mason’s new lobbying clients include Taser, Google, CSRA Inc. (an IT services company), and the National Fisheries Institute. <sup>58</sup>
<b>Mike</b>	<b>McKenna</b>	Department of Energy and Nuclear Regulatory Commission Lead, Domestic Issues Agency Action Team	Transition Team	MWR Strategies	A lobbyist whose clients include Competitive Power Ventures, the Southern Company, Koch Industries, and Dow Chemical who advised President Trump on energy and nuclear matters during the Trump Transition. McKenna left the Transition Team after a new ethics rule required lobbyists on the team to drop their clients. <sup>59</sup>
<b>Daris</b>	<b>Meeks</b>	Deputy Assistant to the President and Director of Domestic Policy for the Vice President	Office of the Vice President	Venable	A former partner on the Legislative and Financial Services team at Venable, a lobbying firm serving the financial services industry. Meeks' clients included Met Life, S&P Global, Franklin Advisors, D. E. Shaw, Experian, and BlueMountain Capital. <sup>60</sup>

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<b>Justin</b>	<b>Mikolay</b> <sup>o</sup>	Special Assistant at the Office of the Secretary of Defense	Defense	Palantir Technologies, Inc.	Served as an "Evangelist" and lobbyist at Palantir Technologies, a software company that often competes for federal defense contracts. <sup>61</sup>
<b>Nathan</b>	<b>Miller</b> <sup>o</sup>	Senior Advisor	Small Business Association	Public Strategies Washington, Inc.	As a lobbyist at Public Strategies, represented corporate clients including Bain Capital, Anheuser-Busch, NASDAQ, Lockheed Martin, and Liberty Mutual. The U.S. Chamber of Commerce also paid Miller for lobbying. <sup>62</sup>
<b>Matthew</b>	<b>Morgan</b>	Deputy Assistant to the Vice President and Deputy Counsel	Office of the Vice President	Barnes & Thornburg	A lobbyist at Barnes & Thornburg for primarily Indiana-based, public sector clients. <sup>63</sup>
<b>Andrew</b>	<b>Olmem</b>	Special Assistant to the President for Financial Policy	National Economic Council	Venable	A former lobbyist at Venable, Olmem represented MetLife, a large insurance company that the Financial Stability Oversight Council designated as a "systemically important financial institution" (SIFI) in 2014. MetLife challenged the designation in court, and Olmem moved on to advise the President on financial policy. The White House issued an ethics waiver that exempts Olmem from the requirements of Executive Order 13770 and 5 C.F.R. § 2635.502(a), and just two months later the President ordered the Secretary of the Treasury to review and revise the SIFI designation process. <sup>64</sup>
<b>Wayne</b>	<b>Palmer</b>	Chief of Staff for the Office of the Secretary	Labor	Fontheim International	Served as the Vice President and COO at Fontheim International until 2016, where he lobbied on behalf of the China-U.S. Exchange Foundation and the Alliance for Healthcare Competitiveness. <sup>65</sup>
<b>Mark</b>	<b>Paoletta</b>	Assistant to the Vice President and Counsel*	Office of the Vice President	DLA Piper	Lobbyist at DLA Piper whose clients included CGI Federal, Oracle, and Booz Allen Hamilton  *Also served on the Trump Transition Team Leadership Staff. <sup>66</sup>

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Patricia	Paoletta	Federal Communications Commission Team Member	Transition Team	Harris, Wiltshire, & Grannis	Partner at Harris Wiltshire whose lobbying clients include communications company RingCentral and T-Mobile. <sup>67</sup>
Joshua	Pitcock <sup>o</sup>	Assistant to the President and Chief of Staff to the Vice President*	Office of the Vice President	Pitcock Consulting	A lobbyist for the State of Indiana from 2013 to 2016 who has received a waiver from the White House to communicate with the State of Indiana. In June 2017, Vice President Pence announced he would replace Pitcock as Chief of Staff by August 2017.  *Also served on the Trump Transition Team, de-registering as a lobbyist to work for Vice President Pence. <sup>68</sup>
Rebecca	Rosen <sup>o</sup>	Energy Policy	Transition Team	Devon Energy	A Vice President of Policy and Governmental Affairs at Devon Energy, Rosen lobbied for changes to energy policy as late as 2016. Following criticism of lobbyists' involvement in the Trump Transition, Rosen announced that she would "no longer be lobbying for the company." According to her LinkedIn profile, she remains employed by Devon Energy. <sup>69</sup>
Reed	Rubinstein	Senior Advisor to the Secretary of the Treasury	Treasury	Dinsmore & Scholl,	A former lobbyist for the U.S. Chamber of Commerce who lobbied at Dinsmore & Schohl from 2012 to 2016. <sup>70</sup>
Justin	Schwab	Senior Advisor	EPA	Baker & Hostetler	Lobbyist for Baker & Hostetler who registered to represent the National Association of Insurance and Financial Advisors. <sup>71</sup>
Dawn	Stump	(Nominee) Commissioner	Commodities Futures Trading Commission	Stump Strategic; Futures Industry Association	As a lobbyist at Stump Strategic, Stump has lobbied on behalf of the Futures Industry Association. Prior to working to Stump Strategic, she served as the Senior Vice President and Head of Government Affairs at the Futures Industry Association. <sup>72</sup>
John	Sweeney	Executive Committee Member	Transition Team	SMW Partners	After "interviewing hundreds of potential administration hires" for the Trump Transition, Sweeney returned to his

First Name	Last Name	Administration Position	Agency	Organization	Description
					lobbying job. In 2017, Sweeney has already lobbied the White House on behalf of Comcast and Shell. <sup>73</sup>
Amy	Swonger <sup>o</sup>	Deputy Assistant to the President for Legislative Affairs and Senate Deputy Director	White House Office	Heather Podesta & Partners	A lobbyist at Heather Podesta & Partners (now called Invariant LLC) who, as recently as 2017, lobbied on behalf of Cigna, the National Association of Real Estate Investment Trusts, Uranium Producers of America, and the New York Life Insurance Company. <sup>74</sup>
Michael	Torrey <sup>o</sup>	Agriculture Lead, Domestic Issues Agency Action Team	Transition Team	Michael Torrey Associates	A lobbyist representing American Beverage Association, DuPont, and the Snack Foods Association (SNAC International), among other clients. Torrey resigned after a new ethics rule required lobbyists on the team to “terminate lobbying registration” in November 2016. <sup>75</sup>
Brooks	Tucker	(Nominee) Assistant Secretary for Congressional and Legislative Affairs*	Veterans Affairs	Continental Consulting Group Corporation	In 2016, worked as the Vice President of Government Relations at the Continental Consulting Group Corporation and was registered to lobby on behalf of companies including the aerospace and defense manufacturer Air Comm Corporation, Canadian defense simulation company CAE USA Inc., and imaging company FLIR Systems Inc.  *Currently serving as a Senior Advisor at the Department of Veterans Affairs. Tucker also served on the Transition Team as a member of the Policy Implementation Team for Veterans Policy <sup>76</sup>
Stephen	Vaughn <sup>o</sup>	General Counsel	U.S. Trade Representative	Skadden, Arps, Slate, Meagher, and Flom	Worked as lawyer at Skadden, Arps, Slate, Meagher, and Flom, where he lobbied on behalf of U.S. Steel. <sup>77</sup>
Robert	Wasinger	White House Liaison*	State	McGuireWoods	Took a lobbying job at McGuireWoods in March 2017 after serving briefly at the State Department. Wasinger's clients include Verizon and Inovio Pharmaceuticals. Wasinger reportedly left the Trump Administration

First Name	Last Name	Administration Position	Agency	Organization	Description
					without signing a required Ethics Pledge.  *Worked on Congressional Outreach for the Trump Transition. <sup>78</sup>
<b>Martin</b>	<b>Whitmer</b> <sup>o</sup>	Transportation and Infrastructure Lead, Policy Implementation Team	Transition Team	Whitmer & Worrall	Founding partner of lobbying firm Whitmer & Worrall, which has represented the National Asphalt Paving Association. <sup>79</sup>
<b>Chad</b>	<b>Wolf</b>	Chief of Staff for the Transportation Security Administration (TSA)	Homeland Security	Wexler Walker	Worked as Vice President and Senior Director at consulting firm Wexler Walker. In 2016, Wolf lobbied on behalf of Cintas, the National Association of Software and Services Companies, and Pershing Square Capital. <sup>80</sup>
<b>Jeffrey</b>	<b>Wood</b>	Acting Assistant Attorney General, Environmental and Natural Resources Division	Justice	Balch & Bingham	Former Partner at Balch & Bingham LLP, where he lobbied on behalf of the Alabama Power Company and the Southern Company. <sup>81</sup>

**Appendix II**  
**Lobbyists in the Trump Administration (pre-2015)**  
**Last Updated: 7.7.17**

<b>First Name</b>	<b>Last Name</b>	<b>Administration Position</b>	<b>Agency</b>	<b>Last Year as Registered Lobbyist</b>
<b>Patricia</b>	<b>Adkins<sup>82</sup></b>	Executive Director	Consumer Product Safety Commission	2010
<b>Richard</b>	<b>Ashooh<sup>83</sup></b>	(Nominee) Assistant Secretary for Export Enforcement	Commerce	2010
<b>Rich</b>	<b>Bagger<sup>84</sup></b>	Executive Director* *Left the Transition Team after the departure of Governor Chris Christie from the Team in November 2016.	Transition Team	2006
<b>John</b>	<b>Barsa<sup>85</sup></b>	Acting Assistant Secretary, Office of Partnership and Engagement	Homeland Security	2013
<b>Deidre</b>	<b>Bass<sup>86</sup></b>	Senior Advisor	HUD	2008
<b>Brian</b>	<b>Benczkowski<sup>87</sup></b>	(Nominee) Assistant Attorney General for the Criminal Division	Justice	2012
<b>Susan</b>	<b>Bodine<sup>88</sup></b>	(Nominee) Assistant Administrator for Enforcement and Compliance Assurance	EPA	2014
<b>Mary Anne</b>	<b>Bradfield<sup>89</sup></b>	Chief of Staff* *Also served on the Small Business Association Team for the Trump Transition.	Small Business Association	2004
<b>Kenneth</b>	<b>Braithwaite<sup>90</sup></b>	Department of Defense Team Member	Transition Team	2008
<b>David</b>	<b>Brouillette<sup>91</sup></b>	(Nominee) Deputy Secretary	Energy	2008
<b>David</b>	<b>Burton<sup>92</sup></b>	Office of Management and Budget Team Member	Transition Team	2014

First Name	Last Name	Administration Position	Agency	Last Year as Registered Lobbyist
Bradley	Buswell <sup>93</sup>	Department of Homeland Security Transition Team Member	Transition Team	2013
Scott	Cameron <sup>94</sup>	Principal Deputy Assistant Secretary for Policy, Management, and Budget	Interior	2001
Annie	Caputo <sup>95</sup>	(Nominee) Commissioner	Nuclear Regulatory Commission	2007
Safra	Catz <sup>96</sup>	Executive Committee Member	Transition Team	2008
William	Chatfield <sup>97</sup>	Veterans Affairs Team	Transition Team	2002
Jason	Chung <sup>98</sup>	Deputy Assistant Secretary	Transportation	2008
Christine	Ciccione <sup>99</sup>	Vetting Assistant	Transition Team	2012
Daniel	Coats <sup>100</sup>	Director	Office of the Director of National Intelligence	2010
Sean	Cunningham <sup>101</sup>	Federal Energy Regulatory Commission Team Member	Transition Team	2012
Martin	Dannenfelser <sup>102</sup>	Assistant to the Secretary	Energy	2005
Lynda	Davis <sup>103</sup>	Chief Veterans Experience Officer	Veterans Affairs	2005
Patrick	Davis <sup>104</sup>	Senior Advisor	EPA	2008
Bo	Denysyk <sup>105</sup>	Department of Transportation Team Member	Transition Team	2007
Douglas W.	Domenech <sup>106</sup>	(Nominee) Assistant Secretary for Insular Areas* *Also served on the Interior Department Landing Team during the Trump Transition.	Interior	2010
George	Dunlop <sup>107</sup>	Policy Advisor	Agriculture	2001

<b>First Name</b>	<b>Last Name</b>	<b>Administration Position</b>	<b>Agency</b>	<b>Last Year as Registered Lobbyist</b>
<b>Jeffrey</b>	<b>Eisenach</b> <sup>108</sup>	FCC Lead, Economic Issues Agency Action Team	Transition Team	2006
<b>Robert</b>	<b>Eitel</b> <sup>109</sup>	Senior Counselor to the Secretary	Education	2011
<b>William</b>	<b>Gaynor</b> <sup>110</sup>	Department of Commerce, Landing Team Member	Transition Team	2010
<b>Pete</b>	<b>Giambastiani</b> <sup>111</sup>	Principal Deputy Assistant Secretary for Legislative Affairs	Defense	2014
<b>Michael</b>	<b>Glassner</b> <sup>112</sup>	Leadership Team, Special Advisor for Operations	Transition Team	2008
<b>Sheila</b>	<b>Greenwood</b> <sup>113</sup>	Chief of Staff	HUD	2014
<b>Chris</b>	<b>Grieco</b> <sup>114</sup>	Associate Counsel to the President	Executive Office of the President	2007
<b>Amanda</b>	<b>Gunasekara</b> <sup>115</sup>	Senior Policy Advisor to the Administrator on Air and Radiation	EPA	2014
<b>Eric</b>	<b>Hargan</b> <sup>116</sup>	(Nominee) Deputy Secretary	HHS	2010
<b>William</b>	<b>Hartzog</b> <sup>117</sup>	Department of Defense, Landing Team Member	Transition Team	2005
<b>Chris</b>	<b>Hassler</b> <sup>118</sup>	Department of Defense Team Member	Transition Team	2003
<b>Robert</b>	<b>Haus</b> <sup>119</sup>	Director, Public Affair	Energy	2014
<b>Scott</b>	<b>Hommel</b> <sup>120</sup>	Chief of Staff	Interior	2012
<b>Christopher</b>	<b>Horner</b> <sup>121</sup>	Environmental Protection Agency Team	Transition Team	1999
<b>Beth</b>	<b>Kaufman</b> <sup>122</sup>	Agency Transformation and Innovation Agency Action Team	Transition Team	2005
<b>Jason</b>	<b>Klitenic</b> <sup>123</sup>	Government Printing Office, National Archives and Records Administration, Postal Regulatory Commission, and USPS Team Member	Transition Team	2006



First Name	Last Name	Administration Position	Agency	Last Year as Registered Lobbyist
Joel	Leftwich <sup>124</sup>	Agriculture Lead, Domestic Issues Agency Action Team	Transition Team	2014
Robert	Lighthizer <sup>125</sup>	U.S. Trade Representative*  *Also served on the Transition Team as an advisor for the Office of the U.S. Trade Representative.	U.S. Trade Representative	2012
Robert	MacKichan <sup>126</sup>	General Services Administration, Landing Team Member	Transition Team	2013
Drew	Maloney <sup>127</sup>	(Nominee) Assistant Secretary for Legislative Affairs*  *Currently serves as the Deputy Undersecretary for Legislative Affairs at Treasury.	Treasury	2012
John	Mashburn <sup>128</sup>	Special Assistant to the President and Deputy Cabinet Secretary*  *Also served as a Senior Policy Advisor for the Trump Transition.	Executive Office of the President	2010
Brigham	McCown <sup>129</sup>	Department of Transportation Team Member	Transition Team	2008
William	McGinley <sup>130</sup>	Deputy Assistant to the President and Cabinet Secretary	Executive Office of the President	2009
Marianne	McInerney <sup>131</sup>	Assistant to the Secretary and Director of Public Affairs	Transportation	2006
Charles	Miller <sup>132</sup>	NASA Team Member	Transition Team	1999
Emily	Murphy <sup>133</sup>	White House Liaison	General Services Administration	2007
George	Nesterczuk <sup>134</sup>	(Nominee) Director*  *Also served on the General Services Administration Team for the Trump Transition.	Office of Personnel Management	2000

First Name	Last Name	Administration Position	Agency	Last Year as Registered Lobbyist
Peter	Oppenheim <sup>135</sup>	(Nominee) Assistant Secretary for Legislation and Congressional Affairs	Education	2011
William	Palatucci <sup>136</sup>	General Counsel*  *Left the Transition Team after the departure of Governor Chris Christie from the Team in November 2016.	Transition Team	2005
Kendell	Pease <sup>137</sup>	Department of Defense Team Member	Transition Team	2013
Patrick	Pizzella <sup>138</sup>	(Nominee) Deputy Secretary*  *Also served on the Office of Management and Budget Team during the Trump Transition.	Labor	2000
Michael	Platt <sup>139</sup>	(Nominee) Assistant Secretary for Legislative and Intergovernmental Affairs	Commerce	2012
Thomas	Pyle <sup>140</sup>	Energy Lead, Domestic Issues Agency Action Team	Transition Team	2008
Scott	Rayder <sup>141</sup>	Department of Commerce Team Member	Transition Team	2001
David	Redl <sup>142</sup>	(Nominee) Assistant Secretary for Communications and Information	Commerce	2009
Lora	Ries <sup>143</sup>	Senior Advisor to the Undersecretary of Management*  *Also handled Immigration Policy for the Department of Homeland Security Agency Action Team during the Trump Transition.	Homeland Security	2010
Carolyn	Roddy <sup>144</sup>	Federal Communications Commission Team Member	Transition Team	2009
John	Sanders <sup>145</sup>	Department of Homeland Security Team Member	Transition Team	1999
George	Sifakis <sup>146</sup>	Assistant to the President and Director for the Office of Public Liaison	Executive Office of the President	2010

First Name	Last Name	Administration Position	Agency	Last Year as Registered Lobbyist
Jack	Spencer <sup>147</sup>	Department of Energy Team Member	Transition Team	2007
Heidi	Stirrup <sup>148</sup>	Special Assistant	HHS	2008
George	Sugiyama <sup>149</sup>	Deputy Associate Administrator for Policy	EPA	2013
Adam	Sullivan <sup>150</sup>	(Nominee) Assistant Secretary for Government Affairs	Transportation	2011
Kent	Talbert <sup>151</sup>	Department of Education Team Member	Transition Team	2011
Ronald F.	Thomas <sup>152</sup>	Department of Veterans Affairs Team Member	Transition Team	2011
Robert	Tompkins <sup>153</sup>	General Services Administration Team Member	Transition Team	2008
Cathy	Tripodi <sup>154</sup>	Director, National Laboratory Operations	Energy	2012
Laura	Trueman <sup>155</sup>	Special Assistant	Health and Human Services	2007
Eric	Ueland <sup>156</sup>	(Nominee) Under Secretary for Management	State	2013
John	Walk <sup>157</sup>	Associate Counsel to the President	Executive Office of the President	2008
Rebecca	Wood <sup>158</sup>	Chief Counsel, Food & Drug Administration	HHS	2008
Shirley	Ybarra <sup>159</sup>	Department of Transportation Transition Team Member	Transition Team	2003
Mark	Zelden <sup>160</sup>	Special Assistant to the Secretary* *Also served on the Trump Transition on the Department of Labor Team.	Labor	2014

**Appendix III**  
**Corporate Insiders in the Trump Administration**  
**Last Updated: 7.11.17**

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
<b>Paul</b>	<b>Atkins</b>	Lead, Independent Financial Agencies, Economic Issues Agency Action Team	Transition Team	Corporate Executive	Patomak Global Partners	Former Securities and Exchange Commissioner during the run-up to the financial crisis who aggressively opposed holding Wall Street accountable for defrauding investors. Atkins was an "outspoken critic" of levying fines on financial institutions that broke the law, and currently serves as the CEO of Patomak Global Partners, a financial services consulting firm. <sup>161</sup>
<b>Marshall</b>	<b>Billingslea</b>	(Nominee) Assistant Secretary for Terrorist Financing	Treasury	Corporate Consultant	Deloitte	Works as the Managing Director of Business Intelligence at consulting firm Deloitte. In this position, he "serves as external advisor to a number of aerospace, defense, and security companies on trade compliance and business strategy." <sup>162</sup>
<b>Nancy</b>	<b>Beck</b>	Deputy Assistant Administrator, Office of Chemical Safety and Pollution Prevention	EPA	Corporate Executive	American Chemistry Council	Former Senior Director of Regulatory Science Policy at the American Chemistry Council, the "leading lobbying group" for the chemical industry whose members include Dow, DuPont, Exxon Mobil, and Chevron. <sup>163</sup>
<b>Jeffrey</b>	<b>Bossert Clark</b>	(Nominee) Assistant Attorney General for Environment and Natural Resources	Justice	Corporate Lawyer	Kirkland & Ellis	A Partner at Kirland & Ellis who serves in the firm's environmental litigation practice, Bossert Clark "has a long history of opposing climate action for corporate and ideological clients." He has defended multiple corporate clients from environmental-based lawsuits, including BP during the fallout of the Deepwater Horizon spill, and represented the U.S. Chamber of Commerce a lawsuit challenging carbon emissions regulations. <sup>164</sup>
<b>Benjamin</b>	<b>Cassidy</b>	Assistant Secretary for Legislative Affairs	Homeland Security	Corporate Executive	Boeing	Former executive at Boeing who led the "international business development and

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
						government relations assignments in the defense sector” for the defense company. <sup>165</sup>
<b>Jay</b>	<b>Clayton</b>	Chairman	SEC	Corporate Lawyer	Sullivan & Cromwell	A former Partner at Sullivan & Cromwell who has represented numerous Wall Street clients, including Goldman Sachs, Barclays, SoftBank, Bear Stearns, Deutsche Bank, and UBS. <sup>166</sup>
<b>Gary</b>	<b>Cohn</b>	Chief Economic Advisor	National Economic Council	Corporate Executive	Goldman Sachs	Former President and Chief Operating Officer at Goldman Sachs who received \$285 billion in payment after leaving the bank to chair the National Economic Council. <sup>167</sup>
<b>Dan</b>	<b>DiMicco</b>	U.S. Trade Representative Lead, Economic Issues Agency Action Team	Transition Team	Corporate Executive	Duke Energy; Nucor	Former CEO of steel maker Nucor and current Board Member of Duke Energy. <sup>168</sup>
<b>Gregory</b>	<b>Doud</b>	(Nominee) Chief Agricultural Negotiator	U.S. Trade Representative	Corporate Executive	Commodity Markets Council	President of the Commodity Markets Council, the leading trade association for commodities futures exchanges. <sup>169</sup>
<b>David</b>	<b>Ehrhart</b>	(Nominee) General Counsel of the Air Force	Defense	Corporate Lawyer	Lockheed Martin	Currently an Associate General Counsel for defense company Lockheed Martin. Ehrhart is the lead counsel for the company's F-35 program, which President Trump has publicly criticized. <sup>170</sup>
<b>Jeff</b>	<b>Eisenach</b>	FCC Lead, Economic Issues Agency Action Team	Transition Team	Corporate Consultant	Verizon	A "paid consultant for Verizon" who advised President Trump on FCC matters during the Trump Transition. <sup>171</sup>
<b>Robert</b>	<b>Eitel</b>	Senior Counselor to the Secretary	Education	Corporate Executive	Bridgepoint Education	Eitel was Vice President of Regulatory Legal Services at Bridgepoint Education, a for-profit higher education company. In 2016, the CFPB fined Bridgepoint over \$23 million for deceiving its students. <sup>172</sup>
<b>Scott</b>	<b>Gottlieb</b>	Commissioner, Food and Drug Administration	HHS	Corporate Executive	New Enterprise Associates	As a Venture Partner of New Enterprise Associates, a venture capital firm that invests in healthcare and technology, Gottlieb was financially connected to numerous healthcare companies. <sup>173</sup>

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
<b>William</b>	<b>Hinman</b>	Director of the Division of Corporation Finance	SEC	Corporate Lawyer	Simpson Thacher & Bartlett	Former partner in the Silicon Valley office of Simpson Thacher who oversaw the initial public offerings of Alibaba, Facebook, and Google. Among other responsibilities, the Division of Corporation Finance at the SEC regulates public company filings. Hinman will “help craft any new [SEC] rules for public and private offerings.” <sup>174</sup>
<b>Maren</b>	<b>Kasper</b>	Executive Vice President and Acting President of Ginnie Mae	HUD	Corporate Executive	Roofstock	Former Director at Roofstock, an “online marketplace for investors in single-family rental properties.” Ethics officials at HUD permitted Kasper to maintain her financial interests in Roofstock—a company affected by HUD regulations. Prior to working at Ginnie Mae, Kasper served as a Senior Advisor to the Secretary at HUD, where she worked on the agency “deregulation team.” <sup>175</sup>
<b>Keith</b>	<b>Kellogg</b>	Chief of Staff*	National Security Council	Corporate Executive	Cubic Corporation	Corporate Vice President and Senior Executive at Cubic, which provides “innovative technologies...for government and commercial customers.”  *Also served as the Lead of the Defense Agency Action Team for the Trump Transition. <sup>176</sup>
<b>Robert</b>	<b>Lighthizer</b>	U.S. Trade Representative*	U.S. Trade Representative	Corporate Lobbyist	Skadden, Arps, Slate, Meagher, & Flom	Former Partner and lobbyist at Skadden Arps who represented U.S. Steel.  *Also served as a U.S. Trade Representative Landing Team Member for the Trump Transition. <sup>177</sup>
<b>David</b>	<b>Malpass</b>	(Nominee) Undersecretary for International Affairs*	Treasury	Corporate Executive	Encima Global; Bear Stearns	The President of Encima Global, a macroeconomic research firm for Wall Street clients, Malpass served as the Chief Economist of Bear Stearns in the run-up to the financial crash and stated in 2008 that “[h]ousing and debt markets are not that big a part of the U.S. economy, or of job creation.”

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
						*Also served as a co-leader of the Agency Action Team on Economic Issues during the Trump Transition. <sup>178</sup>
<b>James</b>	<b>Manning</b>	Senior Advisor to the Under Secretary and Acting Under Secretary	Education	Corporate Consultant	USA Funds, Inc.	A former consultant for United Student Aid (USA) Funds, a student loan guarantor that sued the Department of Education in 2015 over a regulation limiting the fees that guarantors could charge borrowers. Just months after Manning joined the Administration, the Education Department retracted the rule. Manning was a member of the “deregulation team” at Ed.  *Manning also advised the Trump Transition on Education policy. <sup>179</sup>
<b>Ryan</b>	<b>McCarthy</b>	(Nominee) Undersecretary of the Army	Defense	Corporate Executive	Lockheed Martin	Has was Vice President of Security Policy at Lockheed Martin, a defense company, since 2011. <sup>180</sup>
<b>Brian</b>	<b>McCormack</b>	Chief of Staff	Energy	Corporate Lobbyist	Edison Electric Institute	Former Vice President for Political and External Affairs at Edison Electric Institute, a trade organization “representing investor-owned electrical utilities.” McCormack worked with industry-funded groups to oppose solar development. <sup>181</sup>
<b>Brent</b>	<b>McIntosh</b>	(Nominee) General Counsel	Treasury	Corporate Lawyer	Sullivan & Cromwell	Partner at Sullivan & Cromwell and co-head of the firm’s cyber security practice. McIntosh’s list of former clients includes numerous financial institutions, such as Barclays, JP Morgan Chase, and Morgan Stanley, as well as the U.S. Chamber of Commerce. <sup>182</sup>
<b>Steve</b>	<b>Mnuchin</b>	Secretary	Treasury	Corporate Executive	OneWest Bank	In the aftermath of the 2008 financial crisis, Mnuchin purchased IndyMac Bank (renamed OneWest) from the Federal Deposit Insurance Corporation. Under his leadership, the bank became “a leader in foreclosing on seniors.” In 2014, Mnuchin sold OneWest Bank for \$3.4 billion. <sup>183</sup>

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
<b>Carlos</b>	<b>Muñiz</b>	(Nominee) General Counsel	Education	Corporate Consultant	McGuireWoods	A Partner and Senior Vice President with McGuireWoods' National & Multistate Strategies Group. Prior to joining McGuireWoods, Muniz worked for Florida Attorney General Pam Bondi. While working for Bondi, Muniz defended Florida's decision to take no action against fraudulent Trump University. <sup>184</sup>
<b>Keith</b>	<b>Noreika</b>	Acting Comptroller of the Currency	Treasury	Corporate Lawyer	Simpson Thacher & Bartlett	As a Partner in Simpson Thacher's Financial Institutions Practice, Noreika represented "an array of banks," including JP Morgan, Bank of America, and Citigroup. <sup>185</sup>
<b>Joseph</b>	<b>Otting</b>	(Nominee) Comptroller of the Currency	Treasury	Corporate Executive	OneWest Bank	CEO of OneWest bank from 2010-2015, when the bank became "a leader in foreclosing on seniors." <sup>186</sup>
<b>Marcus</b>	<b>Peacock</b>	Senior Advisor	OMB	Corporate Executive	Business Roundtable	After serving briefly at OMB, Peacock took a job as an Executive Vice President at the Business Roundtable, a lobbying group whose work overlaps with policies at OMB. Peacock has committed to not lobby OMB for 6 months--in spite of the 5-year lobbying ban included in President Trump's Ethics Pledge that Peacock signed. The Trump Administration granted him a waiver to that portion of the pledge. <sup>187</sup>
<b>David</b>	<b>Pekoske</b>	(Nominee) Assistant Secretary of Homeland Security, Transportation Security Administration	Homeland Security	Corporate Executive	A-T Solutions; PAE	Former Group President at A-T Solutions, a company specializing in counter terrorism products, and former Vice President at PAE, a holding company specializing in aviation and logistics services. <sup>188</sup>
<b>Chris</b>	<b>Pilkerton</b>	General Counsel	Small Business Administration	Corporate Executive	JP Morgan Chase	Former compliance director at JP Morgan, where he advised "business and corporate functions on matters related to enterprise compliance risk and regulatory change management." <sup>189</sup>
<b>Mira</b>	<b>Ricardel</b>	(Nominee) Undersecretary for Export Administration*	Commerce	Corporate Executive	Boeing	Ricardel was Vice President of Boeing, one of the largest recipients of federal defense contracts, until 2015.



First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
						*Ricardel currently serves as Special Assistant to the President and Associate Director for Presidential Personnel. <sup>190</sup>
<b>Lora</b>	<b>Ries</b>	Senior Advisor to the Undersecretary of Management*	Homeland Security	Corporate Consultant	CSRA International/Computer Sciences Corporation	A former lobbyist who represented federal contractors like Boeing before deregistering in 2010, Ries worked as the Senior Principal for Homeland Security and Government Relations at CSRA International, a federal contractor that sells software to the FBI, ICE, and ATF.  *Also handled Immigration Policy for the Department of Homeland Security Agency Action Team during the Trump Transition. <sup>191</sup>
<b>Jeffrey</b>	<b>Rosen</b>	Deputy Secretary	Transportation	Corporate Lawyer	Kirkland & Ellis	A former Senior Partner at Kirkland & Ellis whose past clients include the Alliance of Automobile Manufacturers, Hyundai, General Motors, and the U.S. Chamber of Commerce. <sup>192</sup>
<b>Wilbur</b>	<b>Ross</b>	Secretary	Commerce	Corporate Executive	WL Ross & Co.	Billionaire investor formerly known as "the king of bankruptcy" for his "knack for buying troubled companies on the cheap and selling them for billions of dollars in profit." <sup>193</sup>
<b>Patrick</b>	<b>Shanahan</b>	Deputy Secretary	Defense	Corporate Executive	Boeing	A Senior Vice President at Boeing, one of the nation's largest defense contractors. <sup>194</sup>
<b>Rex</b>	<b>Tillerson</b>	Secretary	State	Corporate Executive	Exxon Mobil	Former CEO of Exxon Mobil who has ties with Russian President Vladimir Putin. Under Tillerson's leadership, Exxon Mobil funneled money to climate deniers and groups opposing environmental regulations. <sup>195</sup>
<b>Seema</b>	<b>Verma</b>	Administrator of the Centers for Medicare and Medicaid Services	HHS	Corporate Consultant	SVC Inc.	As the founder of SVC Inc. (now called HMA Medicaid Market Solutions) a health care consulting company, Verma represented a variety of clients, including Arkansas, Indiana, Iowa, Kentucky, Ohio, Virginia, and South Carolina. Verma received a limited ethics waiver to allow her to work on matters

First Name	Last Name	Administration Position	Agency	Corporate History	Company	Description
						related to those states, but did not receive a waiver for other former clients. <sup>196</sup>
<b>Heather</b>	<b>Wilson</b>	Secretary of the Air Force	Defense	Corporate Consultant	Lockheed Martin	Former consultant whose efforts to secure Lockheed Martin a contract renewal to manage Sandia National Laboratories, without competitors, led some to call her an "ethical wreck." <sup>197</sup>

<sup>1</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rebeckah Adcock” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Rebeckah Adcock,” *LinkedIn* (accessed July 11, 2017) (online at <https://www.linkedin.com/in/rebafree/>); Danielle Ivory and Robert Faturechi, “The Deep Industry Ties of Trump’s Deregulation Teams,” *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/2017/07/11/business/the-deep-industry-ties-of-trumps-deregulation-teams.html?smprod=nytcore-iphone&smid=nytcore-iphone-share>).

<sup>2</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jennifer Arangio” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Jennifer Arangio,” *LinkedIn* (accessed July 6, 2017) (online at <https://www.linkedin.com/in/jennifer-arangio-7969b85/>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); “Perceptics” (online at <http://www.perceptics.com/>).

<sup>3</sup> Isaac Arnsdorf, “More Lobbyists on the transition,” *Politico* (November 11, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Bud Albright” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>4</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Byron Anderson” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).

<sup>5</sup> *Note*: Banks claims that his registration as a lobbying was “in error,” and that “he did not do work qualifying him as a lobbyist” while working at the American Council for Capital Formation. See U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “George David Banks” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Megan R. Wilson, “Lobbyists finding spots in Trump administration,” *The Hill* (March 15, 2017) (online at <http://thehill.com/business-a-lobbying/324195-more-lobbyists-finding-spots-in-trump-administration>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); American Council for Capital Formation, “George ‘David’ Banks” (captured by the WaybackMachine on March 15, 2016) (online at [https://web.archive.org/web/20160315233208/http://accf.org/wp-content/uploads/2012/02/BIO\\_David-Banks3.pdf](https://web.archive.org/web/20160315233208/http://accf.org/wp-content/uploads/2012/02/BIO_David-Banks3.pdf)); Justin Elliot, “How the Trump Administration May Be Skirting Its Own Ethics Rules,” *ProPublica* (March 3, 2017) (online at <https://www.propublica.org/article/how-the-trump-administration-may-be-skirting-its-own-ethics-rules>).

<sup>6</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoel.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Peter Barrett” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Peter Barrett,” *LinkedIn* (accessed July 6, 2017) (online at <https://www.Linkedin.com/in/peter-barrett-95b0506/>).

<sup>7</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Bartrum” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); The White House, “President Donald J. Trump Announces Key Additions to his Administration” (April 13, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/07/13/president-donald-j-trump-announces-key-additions-his-administration>); Squire Patton Boggs, “John J. Bartrum” (online at <http://www.squirepattonboggs.com/en/professionals/b/bartrum-john>).

<sup>8</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Erika Baum” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).

<sup>9</sup> Senator Whitehouse, “Whitehouse, Merkley Ask How EPA Appointee Could Possibly Do Her Job Given Extensive Ethics Conflicts” (May 16, 2017) (online at <https://www.whitehouse.senate.gov/news/release/whitehouse-merkley-ask-how-epa-appointee-could-possibly-do-her-job-given-extensive-ethics-conflicts>); Natasha Geiling, “Trump’s new EPA appointee violates his own ethics order, senators say,” *ThinkProgress* (May 17, 2017) (online at <https://thinkprogress.org/epa-appointee-ethics-order-bennett-b3688b456823>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Tate Bennett” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>10</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “David Bernhardt” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “David Bernhardt,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/david-bernhardt-b9400711/>); Brownstein Hyatt Farber Schreck, “David Longly Bernhardt” (online at <http://www.bhfs.com/people/attorneys/a-b/dbernhardt>).

<sup>11</sup> Theodor Meyer, “Boswell heads to Agriculture Department,” *Politico* (April 20, 2017) (online at <http://www.politico.com/tipsheets/politico-influence/2017/04/boswell-heads-to-agriculture-department-219888>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Kristi Boswell” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); John Binder, “Pro-labor Outsourcing Lobbyist Joins Trump’s Agriculture Department,” *Breitbart* (April 23, 2017) (online at <http://www.breitbart.com/texas/2017/04/23/pro-labor-outsourcing-lobbyist-joins-trumps-agriculture-dept/>); “Kirsti Boswell,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/kristi-boswell-b3696819/>).

<sup>12</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Tara Bradshaw” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Nancy Cook, “Trump’s Sherpas,” *Politico* (December 26, 2016) (online at <http://www.politico.com/story/2016/12/trump-cabinet-picks-nomination-sherpas-232941>); “Tara Bradshaw,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/tara-bradshaw-451b879/>); Ernst & Young, “About Washington Council Ernst & Young (WCEY)” (online at [http://www.ey.com/us/en/services/tax/tax\\_about-wcey-professionals](http://www.ey.com/us/en/services/tax/tax_about-wcey-professionals)).

<sup>13</sup> “Geoffrey Burr,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/geoffrey-burr-71a4225/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Geoffrey Burr” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>14</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Steve Buyer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); Chad Pergram, “GOP Rep. Steve Buyer to Retire Amid Ethics Probe,” *FoxNews Politics* (January 29, 2010) (online at <http://www.foxnews.com/politics/2010/01/29/gop-rep-steve-buyer-resign-amid-ethics-probe.html>); CREW, “Crew Files IRS and Ethics Complaints Against Rep. Steve Buyer” (online at <https://www.citizensforethics.org/press-release/crew-files-irs-and-ethics-complaints-against-rep-steve-buyer/>).

<sup>15</sup> Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Alex Pryor” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); “Alexandra (Pryor) Campau,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/alexandrapryor/>); Executive Office of the President, “Annual Report to Congress on White House Office Personnel” (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>); Justin Elliot, Derek Kravitz, and Al Shaw, “Meet the Hundreds of Officials Trump Has Quietly Installed Across the Government,” *ProPublica* (March 8, 2017) (online at <https://www.propublica.org/article/meet-hundreds-of-officials-trump-has-quietly-installed-across-government>).

<sup>16</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “James Carroll” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “James Carroll,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/james-carroll-43385111/>).

<sup>17</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Isaac Arnsdorf, “More lobbyists on the transition,” *Politico* (November 11, 2017) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>); Johns Hopkins University, “Member of Our Faculty Is on Trump Transition Team” (January 3, 2017) (online at <http://advanced.jhu.edu/blog/member-of-our-faculty-is-on-trump-transition-team/>).

<sup>18</sup> Public Citizen, “Corporate Interests Infest Trump Transition at Federal Agencies” (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Thomas Carter” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); National Defense Industry Association (NDIA), “Maj Gen Thomas Carter, USAF (Ret)” (online at <http://www.ndia.org/events/2017/2/7/feb-procurement-division-meeting/speakers/major-general-thomas-carter>).

<sup>19</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael Catanzaro” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Counsel to the President, “Memorandum for Michael Catanzaro, Special Assistant to the President,” The White House (released on May 31, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/MICHAEL%20CATANZARO.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Megan R. Wilson, “Lobbyists finding spots in Trump administration,” *The Hill* (March 15, 2017) (online at <http://thehill.com/business-a-lobbying/324195-more-lobbyists-finding-spots-in-trump-administration>); Andrew Restuccia and Isaac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>).

<sup>20</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Robert Charrow,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/robertcharrow/>); <sup>20</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Charrow” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Intrexon, “Company” (online at <https://www.dna.com/Company/Our-Company>).

- <sup>21</sup> Al Shaw, Justin Elliot, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Clark Strategy Group, “Current and Past Clients” (online at <http://clarkstrategygroup.com/current-and-past-clients/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Timothy Clark” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Eisai, Inc., “Welcome to Eisai Inc.” (online at <http://us.eisai.com/>).
- <sup>22</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Mauricio Claver-Carone” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Nora Gámez Torres, “Trump adds Cuba embargo supporter to transition team,” *Miami Herald* (November 21, 2016) (online at <http://www.miamiherald.com/news/nation-world/world/americas/cuba/article116289068.html>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>).
- <sup>23</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Lisa Marie Cheney” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>); “Lisa Marie Cheney,” *LinkedIn* (accessed July 6, 2017) (online at <https://www.Linkedin.com/in/lisa-marie-cheney-b94b2b6/>).
- <sup>24</sup> Isaac Arnsdorf, “More Lobbyists on the transition,” *Politico* (November 11, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Collins” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); S-3 Group, “Rob Collins” (online at <http://www.s-3group.com/rob-collins/>); Ryan Lovelace, “Gorsuch’s team deploys ‘no stone unturned’ campaign before Senate vote on Supreme Court bid,” *Washington Examiner* (March 28, 2017) (online at <http://www.washingtonexaminer.com/gorsuchs-team-deploys-no-stone-unturned-campaign-before-senate-vote-on-supreme-court-bid/article/2618680>).
- <sup>25</sup> Andrew Restuccia and Nancy Cook, “Trump’s Sherpas,” *Politico* (December 26, 2016) (online at <http://www.politico.com/story/2016/12/trump-cabinet-picks-nomination-sherpas-232941>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Earl Comstock” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); “Earl Comstock,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/earlcomstock/>).
- <sup>26</sup> The Spectrum Group, “Mark Cowan, Esq.” (online at <http://spectrumgrp.com/mark-cowan/>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Mark Cowan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Potomac International Partners, “Mark D. Cowan” (online at <http://potomacinternationalpartners.com/index.php?id=5>); Cowan Strategies, “Mark D. Cowan” (online at <http://www.cowanstrategies.net/mcowan>).
- <sup>27</sup> Emily Stephenson and Dustin Volz, “Trump packs transition team with Washington veterans, review shows,” *Reuters* (December 1, 2016) (online at <http://www.reuters.com/article/us-usa-trump-teams-idUSKBN13Q5MR>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Nova Daly” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Wiley Rein, LLP, “Nova J. Daly” (online at <http://www.wileyrein.com/professionals-NovaDaly.html>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>).
- <sup>28</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Makan Delrahim” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

- <sup>29</sup> “Mark T. Esper,” LinkedIn (accessed July 19, 2017) (online at <https://www.linkedin.com/in/mark-t-esper-11b4671/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Mike Esper” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Jeremy Herb, “Trump to tap Raytheon lobbyist as Army secretary,” *CNN Politics* (July 19, 2017) (online at <http://www.cnn.com/2017/07/19/politics/mark-esper-army-secretary-nominee/index.html>).
- <sup>30</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Mike Ference” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Isaac Arnsdorf, “More lobbyists on the transition,” *Politico* (November 11, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>).
- <sup>31</sup> Andrew Restuccia and Nancy Cook, “Trump’s Sherpas,” *Politico* (December 26, 2016) (online at <http://www.politico.com/story/2016/12/trump-cabinet-picks-nomination-sherpas-232941>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Alex Flint” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Alex Flint,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/alex-flint-0a294574/>); Alliance for Market Solutions, “Staff” (online at <https://allianceformarketsolutions.org/staff/>); David Beavers, “Budd complains about NRF ads,” *Politico Influence* (May 31, 2017) (online at <http://www.politico.com/tipsheets/politico-influence/2017/05/31/budd-complains-about-nrf-ads-220593>).
- <sup>32</sup> Isaac Arnsdorf, “Flynn’s Turkish lobbying linked to Russia,” *Politico* (April 25, 2017) (online at <http://www.politico.com/story/2017/04/25/michael-flynn-turkey-russia-237550>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>); President-Elect Donald J. Trump Announces New Vice Chairs and Executive Committee Members Serving on Presidential Transition Team,” *GreatAgain.gov* (November 29, 2016) (online at <https://greatagain.gov/president-elect-trump-announces-new-transition-vice-chairs-executive-committee-members-f654cca0c9e9>).
- <sup>33</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jeffrey Gerrish” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Skadden, Arps, Slate, Meagher, & Flom LLP, “Jeffrey Gerrish” (online at <https://www.skadden.com/professionals/g/gerrish-jeffrey>).
- <sup>34</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “William Greene” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Safari Club International, “What We Do” (online at <https://www.safariclub.org/what-we-do>).
- <sup>35</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Joseph Grogan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Joe Grogan,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/joe-grogan-81b7845/>); Sheila Kaplan and Katie Thomas, “Draft Order on Drug Prices Proposes Easing Regulations,” *New York Times* (June 20, 2017) (online at <https://www.nytimes.com/2017/06/20/health/draft-order-on-drug-prices-proposes-easing-regulations.html>); Richard Knox, “\$1,000 Pill for Hepatitis C Spurs Debate Over Drug Prices,” *NPR* (December 30, 2013) (online at <http://www.npr.org/sections/health-shots/2013/12/30/256885858/-1-000-pill-for-hepatitis-c-spurs-debate-over-drug-prices>); “Emily Kopp, Exclusive: White House Task Force Echoes Pharma Proposals,” *Kaiser Health News* (June 16, 2017) (online at <http://khn.org/news/exclusive-white-house-task-force-echoes-pharma-proposals/>).
- <sup>36</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Taylor Hansen” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Annie Waldman, “Former Lobbyist With For-Profit Colleges Quits Education Department,” *ProPublica* (March 21, 2017) (online at <https://www.propublica.org/article/former-lobbyist-with-for-profit-colleges-quits-education-department>); Al Shaw, Justin Elliott, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (July 19, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Letter from Senator Warren to Secretary Betsy DeVos, Department of Education (March 17, 2017) (online at [https://www.warren.senate.gov/files/documents/2017-3-17\\_Letter\\_to\\_DeVos\\_re\\_ED\\_official\\_hires.pdf](https://www.warren.senate.gov/files/documents/2017-3-17_Letter_to_DeVos_re_ED_official_hires.pdf)).
- <sup>37</sup> Tony Romm, “New details emerge on Trump transition organization,” *Politico* (November 9, 2016) (online at <http://www.politico.com/story/2016/11/new-details-emerge-on-trump-transition-organization-231152>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Steve Hart” (online at

<https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Top Lobbyists 2015: Hired Guns,” *The Hill* (October 29, 2015) (online at <http://thehill.com/business-a-lobbying/top-lobbyists/258462-top-lobbyists-2015-hired-guns>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>).

<sup>38</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Cindy Hayden” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Brian Naylor and Barbara Sprunt, “From Lobbyists to Loyalists, See Who’s On Donald Trump’s Transition Team,” *NPR* (November 16, 2016) (online at <http://www.npr.org/2016/11/16/502175860/from-lobbyists-to-loyalists-see-whos-on-donald-trumps-transition-team>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>).

<sup>39</sup> “Bradley Hayes,” LinkedIn (accessed July 18, 2017) (online at <https://www.linkedin.com/in/bradley-hayes-9341654/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Bradley Hayes” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>40</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Christopher Hess” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Chris Hess,” LinkedIn (accessed July 18, 2017) (online at <https://www.linkedin.com/in/chris-hess-2781255/>).

<sup>41</sup> Michelle Mark, “One of Trump’s newest appointees is still a lobbyist earning hundreds of thousands from Saudi Arabia,” *Business Insider* (June 22, 2017) (online at <http://www.businessinsider.com/trump-appointee-richard-hohlt-is-still-a-lobbyist-earning-hundreds-of-thousands-from-saudi-arabia-2017-6>); The White House, “President Donald J. Trump Announces Intended Appointments to the President’s Commission on White House Fellowships” (June 9, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/06/09/president-donald-j-trump-announces-intended-appointments-presidents>); Carrie Levine, “Trump appoints Saudi government lobbyists to influential White House commission,” *Center for Public Integrity* (June 21, 2017) (online at <https://www.pri.org/stories/2017-06-21/trump-appoints-saudi-government-lobbyist-influential-white-house-commission>); U.S. Department of Justice, Supplemental Statement Pursuant to the Foreign Agents Registration Act—Richard Hohlt (April 30, 2017) (online at <https://www.fara.gov/docs/6384-Supplemental-Statement-20170613-1.pdf>).

<sup>42</sup> “Jack Kalavritinos,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/jack-kalavritinos-3a85294/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “J. Kalavritinos” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. FDA, “Meet Jack Kalavritinos, Associate Commissioner for External Affairs” (online at <https://www.fda.gov/AboutFDA/CentersOffices/ucm556585.htm>); Sheila Kaplan, “Trump taps longtime pharma lobbyist to help run FDA during transition,” *STAT News* (January 19, 2017) (online at <https://www.statnews.com/2017/01/19/fda-lobbyist-kalavritinos/>).

<sup>43</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Gilbert Kaplan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>44</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Julie Kirchner” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Department of Homeland Security, “DHS Announces New CIS Ombudsman Julie Kirchner” (May 2, 2017) (online at <https://www.dhs.gov/news/2017/05/02/dhs-announces-new-cis-ombudsman-julie-kirchner>).

<sup>45</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Shahira Knight” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Counsel to the President, “Memorandum for Shahira Knight, Special Assistant to the President,” The White House (released on May 31, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/SHAHIRA%20KNIGHT.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); Eric Lipton, Ben Protess, and Andrew W. Lehren, “With Trump Appointees, a Raft of Potential Conflicts and ‘No Transparency,’” *New York Times* (April 15, 2017) (online at <https://www.nytimes.com/2017/04/15/us/politics/trump-appointees-potential-conflicts.html>).

- <sup>46</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Shawn Krause” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoel.com/resources-detail-11703.html>).
- <sup>47</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Peter Krug” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Peter Krug,” *LinkedIn* (accessed July 17, 2017) (online at <https://www.Linkedin.com/in/peter-krug-49a47baa/>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).
- <sup>48</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoel.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Bryan Lanza” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Philip Rucker, “Trump adviser Bryan Lanza joins private strategy firm,” *Washington Post* (February 22, 2017) (online at [https://www.washingtonpost.com/news/powerpost/wp/2017/02/22/trump-adviser-bryan-landa-joins-private-strategy-firm/?utm\\_term=.c0648efd5a10](https://www.washingtonpost.com/news/powerpost/wp/2017/02/22/trump-adviser-bryan-landa-joins-private-strategy-firm/?utm_term=.c0648efd5a10)).
- <sup>49</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Russell Laird” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Russell Laird,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/russell-laird-a967211/>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoel.com/resources-detail-11703.html>).
- <sup>50</sup> Sheila Kaplan, “Price’s new chief of staff comes from health care lobbying firm,” *STAT News* (March 2, 2017) (online at <https://www.statnews.com/2017/03/02/price-health-care-lobbyist/>); Eric Lipton and Danielle Ivory, “Lobbyists, Industry Lawyers Were Granted Ethics Waivers to Work in Trump Administration,” *New York Times* (June 7, 2017) (online at <https://www.nytimes.com/2017/06/07/us/politics/lobbyists-ethics-waivers-trump-administration.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Lance Leggitt” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Office of Government Ethics, “Certain agency records received in response to PA-17-02” (released June 7, 2017) (online at <https://www.oge.gov/web/OGE.nsf/0/67460009B646BBF88525813800566276/%24FILE/Certain%20agency%20records%20recd%20in%20response%20to%20PA-17-02.pdf>); Baker Donelson, “Lance B. Leggitt” (captured on March 31, 2015 via the WaybackMachine) (online at <https://web.archive.org/web/20150331180147/https://www.bakerdonelson.com/lance-b-leggitt>).
- <sup>51</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Keagan Lenihan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Leslie Small, “5 names to know in Trump’s ‘beachhead’ team at HHS,” *FierceHealthcare* (March 20, 2017) (online at <http://www.fiercehealthcare.com/healthcare/5-names-to-know-trump-s-beachhead-team-at-hhs>); “Keagan L.,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/keagan-l-071b511/>).
- <sup>52</sup> U.S. Chamber of Commerce, “Rolf Lundberg, Jr.” (online at [https://www.uschamber.com/sites/default/files/legacy/staff/lundberg\\_rolf\\_bio1011.pdf](https://www.uschamber.com/sites/default/files/legacy/staff/lundberg_rolf_bio1011.pdf)); Isaac Arnsdorf, “More lobbyists on the transition,” *Politico* (November 11, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/more-lobbyists-on-the-transition-217372>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rolf Lundberg” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>53</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Ado Machida” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Ado Machida,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/ado-machida-68a9a64/>).
- <sup>54</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Mark Maddox” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Mark Maddox,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/mark-maddox-5b0a4a1a/>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana



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Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>).

<sup>55</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Lauren Maddox” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Theodor Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); The Podesta Group, “Lauren Maddox: Principal” (online at <http://www.podesta.com/talent/lauren-maddox>); Alyson Klein, “Former Bush Staffers Helping Out With Trump’s Education Transition,” *Education Week* (December 15, 2016) (online at [http://blogs.edweek.org/edweek/campaign-k-12/2016/12/former\\_bush\\_staffers\\_helping\\_o.html](http://blogs.edweek.org/edweek/campaign-k-12/2016/12/former_bush_staffers_helping_o.html)); David Halperin, “Who’s Lobbying For For-Profit Colleges In the Trump-DeVos Era?” *Huffington Post* (June 28, 2017) (online at [http://www.huffingtonpost.com/entry/whos-lobbying-for-for-profit-colleges-in-the-trump\\_us\\_5953cef6e4b0c85b96c65e53?ncid=engmodushpimg0000004](http://www.huffingtonpost.com/entry/whos-lobbying-for-for-profit-colleges-in-the-trump_us_5953cef6e4b0c85b96c65e53?ncid=engmodushpimg0000004)); David Halperin, “DeVos Declines To Support For-Profit College Accountability Rules,” *Huffington Post* (January 17, 2017) (online at [http://www.huffingtonpost.com/davidhalperin/devos-declines-to-support\\_b\\_14235348.html](http://www.huffingtonpost.com/davidhalperin/devos-declines-to-support_b_14235348.html)).

<sup>56</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Sarah Makin” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>); The White House, “Vice President Mike Pence Announces Andrea Thompson as National Security Advisor” (January 25, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/01/25/vice-president-mike-pence-announces-andrea-thompson-national-security>).

<sup>57</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael Marshall” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Executive Office of the President, “Annual Report to Congress on White House Office Personnel” (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>); “Michael Marshall,” *LinkedIn* (accessed July 5, 2017) (online at <https://www.linkedin.com/in/marshsrdc/>).

<sup>58</sup> Theodor Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Mason” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>59</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael McKenna” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isaac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>).

<sup>60</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Daris Meeks” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>61</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); “Justin Mikolay,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.linkedin.com/in/justin-mikolay-375bb02/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Justin Mikolay” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Ali Breland, “Pentagon hires former lobbyist for Peter Thiel’s company,” *The Hill* (March 9, 2017) (online at <http://thehill.com/policy/technology/323282-dod-picks-up-former-palantir-employee>).

- <sup>62</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Nathan Miller” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>63</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Matthew Morgan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>64</sup> Counsel to the President, “Memorandum for Andrew Olmem, Special Assistant to the President,” The White House (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/ANDREW%20OLMEM.PDF>); The White House, “White House National Economic Council Director Announces Senior Staff Appointments” (February 27, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/02/27/white-house-national-economic-council-director-announces-senior-staff>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Andrew Olmem” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>65</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Wayne Palmer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Wayne Palmer,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/waynedpalmer>).
- <sup>66</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Mark Paoletta” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>).
- <sup>67</sup> Harris, Wiltshire, & Grannis, LLP, “Patricia J. Paoletta” (online at <https://www.hwglaw.com/team/patricia-j-paoletta/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Patricia Paoletta” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoelaw.com/resources-detail-11703.html>).
- <sup>68</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Joshua Pitcock” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isasac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); Maggie Haberman, “Pence to Replace His Chief of Staff,” *New York Times* (June 19, 2017) (online at <https://www.nytimes.com/2017/06/29/us/politics/mike-pence-josh-pitcock-chief-of-staff.html>); Executive Office of the President, “Waiver Certifications for WHO/OVP Employees” (May 31, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/Waiver%20Chart%205-31-17.pdf>).
- <sup>69</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rebecca Rosen” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Rebecca Rosen,” *LinkedIn* (accessed June 27, 2017) (online at <https://www.Linkedin.com/in/rebeccaarosen/>); Lee Fang, “Donald Trump’s Big Ethics Move is to Replace Lobbyists With Former Lobbyists,” *The Intercept* (November 22, 2016) (online at <https://theintercept.com/2016/11/22/trump-transition-lobbyists-2/>); Robin Vravender, “TRANSITION: Trump’s energy team overhauled,” *E&E News* (November 21, 2016) (online at <https://www.eenews.net/stories/1060046098>).
- <sup>70</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Reed Rubinstein” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Dinsmore, “Reed D. Rubinstein Named Senior Advisor to Treasury Secretary” (January 20, 2017) (online at <http://www.dinsmore.com/reed-d-rubinstein-named-senior-advisor-to-treasury-secretary-01-20-2017/>).

<sup>71</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Justin Schwab” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>72</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Dawn Stump” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Dawn Stump,” LinkedIn (accessed July 19, 2017) (online at <https://www.linkedin.com/in/dawn-stump-84142b16/>).

<sup>73</sup> Theodoric Meyer and Michael Stratford, “Trump transition staffers head to K Street despite lobbying ban,” *Politico* (May 3, 2017) (online at <http://www.politico.com/story/2017/05/03/trump-lobbying-ban-transition-237850>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Sweeney” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>74</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Amy Swonger” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Amy Swonger,” LinkedIn (accessed July 3, 2017) (online at <https://www.Linkedin.com/in/amy-swonger-728ba9102/>); Executive Office of the President, “Annual Report to Congress on White House Office Personnel” (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>); Rebecca Ballhaus, “White House to Announce Amy Swonger as Head of Senate Legislative Affairs,” *Wall Street Journal* (March 20, 2017) (online at <https://www.wsj.com/articles/white-house-to-announce-amy-swonger-as-head-of-senate-legislative-affairs-1490061405>).

<sup>75</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Michael Torrey” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Andrew Restuccia and Isasac Arnsdorf, “Lobbyists leave Trump transition team after new ethics rule,” *Politico* (November 18, 2016) (online at <http://www.politico.com/blogs/donald-trump-administration/2016/11/lobbyists-leave-trump-transition-team-ethics-rule-231641>); Helena Bottemiller Evich, “Michael Torrey leading Trump agriculture transition effort,” *Politico* (November 9, 2016) (online at <http://www.politico.com/story/2016/11/michael-torrey-trump-agriculture-transition-231144>).

<sup>76</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Brooks Tucker” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravitz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); “Brooks Tucker,” LinkedIn (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/brookstucker/>); The White House, “President Donald J. Trump Announces Key Additions to his Administration” (May 12, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/05/12/president-donald-j-trump-announces-key-additions-his-administration>).

<sup>77</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Stephen Vaughn” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Doug Palmer, “Stephen Vaughn, the Hamiltonian at USTR,” *Politico* (April 27, 2017) (online at <http://www.politico.com/agenda/story/2017/04/27/stephen-vaughn-trade-ustr-000429>).

<sup>78</sup> McGuireWoods Consulting, “Robert Wasinger Joins Federal Government Relations Team” (February 15, 2017) (online at <http://www.mwllc.com/ideas/news/2017/2/robert-wasinger-joins-federal-government-relations-team.aspx>); Matea Gold, “A former Trump administration appointee who left without signing ethics pledge is now a lobbyist,” *Washington Post* (March 29, 2017) (online at <https://www.washingtonpost.com/news/post-politics/wp/2017/03/29/a-former-trump-administration-appointee-who-left-without-signing-ethics-pledge-is-now-a-lobbyist/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Wasinger” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>79</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online

at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Martin Whitmer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>80</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Chad Wolf” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Transportation Security Administration, “Chad F. Wolf” (online at <https://www.tsa.gov/leader-bios/chief-of-staff>).

<sup>81</sup> “Jeff Wood,” *LinkedIn* (accessed July 18, 2017) (online at <https://www.LinkedIn.com/in/jeff-wood-6835065/>); U.S. Senate Lobbying Disclosure Act Database, “Jeffrey Wood” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Sean Reilly, “Many recusals for acting chief of DOJ environment section,” *E&E News* (April 25, 2017) (online at <https://www.eenews.net/stories/1060053554>); U.S. Department of Justice, “Meet the Acting Assistant Attorney General” (February 13, 2017) (online at <https://www.justice.gov/enrd/meet-assistant-attorney-general>).

<sup>82</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Patricia Adkins” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>83</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Richard Ashooh” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>84</sup> “Rich Bagger,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.LinkedIn.com/in/richbagger/>); U.S. Senate Lobbying Disclosure Act Database, “Rich Bagger” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Marcus Baram, “Not Quite #DrainTheSwamp: A Running List of the Lobbyists on Trump’s Transition,” *Fast Company* (November 11, 2016) (online at <https://www.fastcompany.com/3065624/not-quite-draintheswamp-a-running-list-of-lobbyists-on-trumps-transition-team>); Karen DeYoung and Greg Miller, “Key figures purged from Trump transition team,” *Washington Post* (November 15, 2016) ([https://www.washingtonpost.com/world/national-security/key-figures-purged-from-trump-transition-team/2016/11/15/ed4e2a36-ab6b-11e6-8b45-f8e493f06fcd\\_story.html](https://www.washingtonpost.com/world/national-security/key-figures-purged-from-trump-transition-team/2016/11/15/ed4e2a36-ab6b-11e6-8b45-f8e493f06fcd_story.html)).

<sup>85</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “John Barsa” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. Department of Homeland Security, “Leadership” (online at <https://www.dhs.gov/leadership>).

<sup>86</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Deidre Bass” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).

<sup>87</sup> Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “Brian Benczkowski” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>88</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Susan Bodine” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

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- <sup>89</sup> Note: Worked as a “State Liaison (Lobbyist)” for the National Rifle Association from 1996 to 2004. See “Mary Anne Bradfield,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/mabradfield/>); Marcus Baram, “Not Quite #DrainTheSwamp: A Running List of the Lobbyists on Trump’s Transition,” *Fast Company* (November 11, 2016) (online at <https://www.fastcompany.com/3065624/not-quite-draintheswamp-a-running-list-of-lobbyists-on-trumps-transition-team>); Small Business Administration, “SBA Administrator Linda McMahon Appoints Mary Anne Bradfield as Chief of Staff” (February 27, 2017) (online at <https://www.sba.gov/about-sba/sba-newsroom/press-releases-media-advisories/sba-administrator-linda-mcmahon-appoints-mary-anne-bradfield-chief-staff>).
- <sup>90</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Kenneth Braithwaite” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>91</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Dan Brouillette” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).
- <sup>92</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “David Burton” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>93</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Bradley Buswell” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>94</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Scott Cameron” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Scott Cameron,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/scott-cameron-63b6905/>).
- <sup>95</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Annie Caputo” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).
- <sup>96</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Safra Catz” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>97</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “William Chatfield” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Marcus Baram, “Not Quite #DrainTheSwamp: A Running List of the Lobbyists on Trump’s Transition,” *Fast Company* (November 11, 2016) (online at <https://www.fastcompany.com/3065624/not-quite-draintheswamp-a-running-list-of-lobbyists-on-trumps-transition-team>).
- <sup>98</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jason Chung” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Jason Chung,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/jason-chung-b04261131/>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).
- <sup>99</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Christine Ciccone” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Marcus Baram, “Not Quite #DrainTheSwamp: A Running List of the Lobbyists on Trump’s Transition,” *Fast Company* (November 11, 2016) (online at <https://www.fastcompany.com/3065624/not-quite-draintheswamp-a-running-list-of-lobbyists-on-trumps-transition-team>); Nancy Cook and Andrew Restuccia, “Inside Trump’s freewheeling vetting operation,” *Politico* (November 23, 2017) (online at <http://www.politico.com/story/2016/11/donald-trump-transition-vetting-231786>).

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<sup>100</sup> Office of the Director of National Intelligence, “Director of National Intelligence” (online at <https://www.dni.gov/index.php/who-we-are/leadership/director-of-national-intelligence>); Eric Lipton, “A Journey from Lawmaker to Lobbyist and Back Again,” *New York Times* (November 13, 2010) (online at <http://www.nytimes.com/2010/11/14/us/politics/14coats.html>); U.S. Senate Lobbying Disclosure Act Database, “Daniel Coats” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>101</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Sean Cunningham” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>102</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Martin Dannenfesler” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Gautham Nagesh, “Upton unveils senior staff for Energy and Commerce Committee,” *The Hill* (December 29, 2010) (online at <http://thehill.com/policy/technology/135411-upton-unveils-senior-staff-for-energy-a-commerce-committee>); Neil Bhaerman, “Who are these people? Part 2-- Energy Beachhead Hires,” *Clean Water Action* (March 14, 2017) (online at <http://www.cleanwateraction.org/2017/03/14/who-are-these-people-part-2-energy-beachhead-hires>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>103</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Lynda Davis” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. Department of Veterans Affairs, “VA Secretary Makes Strides to Improve Veterans Experience” (April 4, 2017) (online at <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=2880>).

<sup>104</sup> Pam Zubeck, “Colorado Springs consultant tapped by Trump for EPA,” *Colorado Springs Independent* (February 15, 2017) (online at <https://www.csindy.com/TheWire/archives/2017/02/15/colorado-springs-consultant-tapped-by-trump-for-epa>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Patrick Davis” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>105</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Bo Denysyk” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>106</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Douglas Domenech” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Department of the Interior, “Interior Secretary Zinke Applauds President Trump’s Nomination of Doug Domenech as Assistant Secretary for Insular Areas” (June 27, 2017) (online at <https://www.doi.gov/pressreleases/interior-secretary-zinke-applauds-president-trumps-nomination-doug-domenech-assistant>); Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>).

<sup>107</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “George Dunlop” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead Teams’ Host Dozens of Former Lobbyists,” *Huffington Post* (March 24, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); OpenSecrets.org, “Century Communications” (online at <https://www.opensecrets.org/lobby/firmsum.php?id=F132625&year=1998>).

<sup>108</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016)

(online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Jeff Eisenach” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>109</sup> See Letter from Senator Elizabeth Warren to Secretary Betsy DeVos, March 17, 2017 (online at [https://www.warren.senate.gov/files/documents/2017-3-17\\_Letter\\_to\\_DeVos\\_re\\_ED\\_official\\_hires.pdf](https://www.warren.senate.gov/files/documents/2017-3-17_Letter_to_DeVos_re_ED_official_hires.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Eitel” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. Department of Education, “U.S. Secretary of Education Announces Chief of Staff and Additional Staff Hires” (April 12, 2017) (online at <https://www.ed.gov/news/press-releases/us-secretary-education-announces-chief-staff-and-additional-staff-hires>).

<sup>110</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “William Gaynor” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>).

<sup>111</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead Teams’ Host Dozens of Former Lobbyists,” *Huffington Post* (March 24, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Department of Defense, “Pete Giambastiani” (online at <https://www.defense.gov/About/Biographies/Biography-View/Article/1177120/pete-giambastiani/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Pete Giambastiani” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>112</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Michael Glassner” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>113</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Sheila Greenwood” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Lorraine Woellert, “Senate confirms Ben Carson for HUD,” *Politico* (March 2, 2017) (online at <http://www.politico.com/story/2017/03/ben-carson-confirmed-hud-235606>); “Sheila Greenwood,” LinkedIn (accessed July 19, 2017) (online at <https://www.linkedin.com/in/sheila-greenwood-6596002b/>).

<sup>114</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Chris Grieco” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Chris Grieco,” LinkedIn (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/chris-grieco-788b6311/>).

<sup>115</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Amanda Gunasekara” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>116</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “Eric Hargan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Eric Hargan,” LinkedIn (accessed July 19, 2017) (online at <https://www.linkedin.com/in/eric-hargan-6a54ba7/>).

<sup>117</sup> Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); U.S. Senate Lobbying Disclosure Act Database, “William Hartzog” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>118</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Chris Hassler” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>119</sup> “Robert Haus,” LinkedIn (accessed July 17, 2017) (online at <https://www.Linkedin.com/in/roberthaus/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert Haus” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the

Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>120</sup> Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>); “Scott Hommel,” *LinkedIn* (accessed July 5, 2017) (online at <https://www.Linkedin.com/in/scott-hommel-17653232/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Scott Hommel” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); U.S. Department of the Interior, “Interior Announces 19 New Hires” (May 26, 2017) (online at <https://www.doi.gov/pressreleases/interior-announces-19-new-hires>).

<sup>121</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Christopher Horner” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Sharon Lerner, “Republicans Are Using Big Tobacco’s Secret Science Playbook To Gut Health Rules,” *The Intercept* (February 5, 2017) (online at <https://theintercept.com/2017/02/05/republicans-want-to-make-the-epa-great-again-by-gutting-health-regulations/>).

<sup>122</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Beth Kaufman” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>123</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Jason Klitenic” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>124</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Joel Leftwich” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Lee Fang, “Donald Trump’s Big Ethics Move is to Replace Lobbyists with Former Lobbyists,” *The Intercept* (November 22, 2016) (online at <https://theintercept.com/2016/11/22/trump-transition-lobbyists-2/>).

<sup>125</sup> Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); U.S. Senate Lobbying Disclosure Act Database, “Robert Lighthizer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.stepto.com/resources-detail-11703.html>).

<sup>126</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Robert MacKichan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>).

<sup>127</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Drew Maloney” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Drew Maloney,” *LinkedIn* (June 26, 2017) (online at <https://www.Linkedin.com/in/drew-maloney-2442034/>); The White House, “President Donald J. Trump Announces Intent to Nominate Key Administration Posts” (March 14, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/03/14/president-donald-j-trump-announces-intent-nominate-key-administration>).

<sup>128</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “John Mashburn” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Executive Office of the President, “Annual Report to Congress on White House Office Personnel” (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>); “John Mashburn,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/john-mashburn-740bb86/>).



<sup>129</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Brigham McCown” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Brigham McCown,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/brighammccown/>).

<sup>130</sup> Marcia Coyle and C. Ryan Barber, “12 Jones Day Lawyers Take Key Posts in Trump Administration,” *National Law Journal* (January 20, 2017) (online at <http://www.nationallawjournal.com/id=1202777272340/12-Jones-Day-Lawyers-Take-Key-Posts-in-Trump-Administration>); U.S. Senate Lobbying Disclosure Act Database, “William McGinley” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Kira Lerner, “Jones Day Adds 3 Patton Boggs Election Law Partners in DC,” *Law360* (May 30, 2014) (online at <https://www.law360.com/articles/543036/jones-day-adds-3-patton-boggs-election-law-partners-in-dc>); Executive Office of the President, “Annual Report to Congress on White House Office Personnel” (June 30, 2017) (online at <https://www.whitehouse.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>).

<sup>131</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘beachhead’ teams host dozens of former lobbyists,” *Open Secrets* (March 24, 2017) (online at <https://www.opensecrets.org/news/2017/03/trumps-beachhead-hosts-dozens-of-former-lobbyists/>); U.S. Department of Transportation, “U.S. Department of Transportation Key Staff Appointments” (May 20, 2017) (online at <https://www.transportation.gov/briefing-room/us-department-transportation-key-staff-appointments>); U.S. Senate Lobbying Disclosure Act Database, “Marianne McInerney” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>132</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Charles Miller” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>133</sup> U.S. Senate Lobbying Disclosure Act Database, “Emily Murphy” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Emily W. Murphy,” *LinkedIn* (accessed July 17, 2017) (online at <https://www.Linkedin.com/in/emilywebstermurphy/>); Jason Miller, “Federal procurement reforms start by naming the right type of leaders, experts tell Trump,” *Federal News Radio* (February 13, 2017) (online at <https://federalnewsradio.com/reporters-notebook-jason-miller/2017/02/federal-procurement-reforms-start-naming-right-type-leaders-experts-tell-trump/>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).

<sup>134</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “George Nesterczuk” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Eric Yoder, “Veteran GOP official on personnel policies named to head OPM,” *Washington Post* (May 24, 2017) (online at <https://www.washingtonpost.com/news/powerpost/wp/2017/05/24/veteran-gop-official-on-personnel-policies-named-to-head-opm/>).

<sup>135</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “Peter Oppenheim” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “John Oppenheim,” *LinkedIn* (accessed July 5, 2017) (online at <https://www.Linkedin.com/in/peter-oppenheim-4132a516/>).

<sup>136</sup> Karen DeYoung and Greg Miller, “Key figures purged from Trump transition team,” *Washington Post* (November 15, 2016) ([https://www.washingtonpost.com/world/national-security/key-figures-purged-from-trump-transition-team/2016/11/15/ed4e2a36-ab6b-11e6-8b45-f8e493f06fcd\\_story.html?utm\\_term=.5937dc070628](https://www.washingtonpost.com/world/national-security/key-figures-purged-from-trump-transition-team/2016/11/15/ed4e2a36-ab6b-11e6-8b45-f8e493f06fcd_story.html?utm_term=.5937dc070628)); U.S. Senate Lobbying Disclosure Act Database, “William Palatucci” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Marcus Baram, “Not Quite #DrainTheSwamp: A Running List of the Lobbyists on Trump’s Transition,” *Fast Company* (November 11, 2016) (online at <https://www.fastcompany.com/3065624/not-quite-draintheswamp-a-running-list-of-lobbyists-on-trumps-transition-team>).

<sup>137</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Kendell Pease” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Tony Bertuca, “Trump names more DOD ‘landing team,’” *Inside Defense* (December 2, 2016) (online at <https://insidedefense.com/insider/trump-names-more-dod-landing-team>).

- 
- <sup>138</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); The White House, “President Donald J. Trump Announces Intent to Nominate Personnel to Key Administration Posts” (June 19, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/06/19/president-donald-j-trump-announces-intent-nominate-personnel-key>); U.S. Senate Lobbying Disclosure Act Database, “Patrick Pizzella” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>139</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “Michael Platt” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>140</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Thomas Pyle” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Lee Fang, “Donald Trump’s Big Ethics Move is to Replace Lobbyists with Former Lobbyists,” *The Intercept* (November 22, 2016) (online at <https://theintercept.com/2016/11/22/trump-transition-lobbyists-2/>).
- <sup>141</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Scott Rayder” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Scott Rayder,” *LinkedIn* (accessed July 7, 2017) (online at <https://www.Linkedin.com/in/scottrayder/>).
- <sup>142</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “David Redl” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>143</sup> “Lora Ries,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/lora-ries-a6ab42a/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Lora Ries” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Lee Fang, Ali Winston, “Trump Homeland Security Adviser Helped Contractors Profit Off Harsh Deportation Policies,” *The Intercept* (December 13, 2016) (online at <https://theintercept.com/2016/12/13/dhs-trump-deportation/>).
- <sup>144</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Carolyn Roddy” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>145</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “John Sanders” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “John Sanders,” *LinkedIn* (accessed July 7, 2017) (online at <https://www.Linkedin.com/in/john-sanders-8a562421/>); OGSsystems, “Tech Veteran John Sanders Joins OGSsystems’ Board of Directors” (online at <https://www.ogsystems.com/newspost/570691bf14b8faaaca9b11db>).
- <sup>146</sup> TNH Staff, “Trump Names George Sifakis as Public Liaison,” *The National Herald* (March 8, 2017) (online at <https://www.thenationalherald.com/153459/bloomberg-trump-names-george-sifakis-public-liaison/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “George Sifakis” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “Here Are the Financial Disclosures of 416 Officials Trump Has Installed Across the Government,” *ProPublica* (June 13, 2017) (online at <https://projects.propublica.org/graphics/trump-disclosures>).
- <sup>147</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Jack Spencer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Relationship Science, “Jack Spencer” (online at <https://relationships science.com/jack-spencer-p25720684>).

- <sup>148</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Heidi Stirrup” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).
- <sup>149</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “George Sugiyama” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “George Sugiyama,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/george-sugiyama-32447751/>).
- <sup>150</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Senate Lobbying Disclosure Act Database, “Adam Sullivan” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); The White House, “President Donald J. Trump Announces Intent to Nominate Personnel to Key Administration Posts” (May 8, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/05/08/president-donald-j-trump-announces-intent-nominate-personnel-key>).
- <sup>151</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Kent Talbert” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>152</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Ronald Thomas” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Blank Rome, “Blank Rome Enhances Government Relations Experience with Three Additions” (June 22, 2010) (online at <http://www.businesswire.com/news/home/20100622005449/en/Blank-Rome-Enhances-Government-Relations-Experience-Additions>).
- <sup>153</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Robert Tompkins” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).
- <sup>154</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Cathy Tripodi” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Cathy Tripodi,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/cathytripodi/>).
- <sup>155</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Laura Trueman” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).
- <sup>156</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Eric Ueland” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).
- <sup>157</sup> The White House, “President Donald J. Trump Announces Key Additions to the Office of the White House Counsel” (March 7, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/03/07/president-donald-j-trump-announces-key-additions-office-white-house>); U.S. Senate Lobbying Disclosure Act Database, “John Walk” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

---

<sup>158</sup> U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name “Rebecca Wood” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); “Industry Attorney, Product Liability Specialist Rebecca Wood Named FDA Chief Counsel,” *InsideHealthPolicy* (July 18, 2017) (online at <https://insidehealthpolicy.com/daily-news/industry-attorney-product-liability-specialist-rebecca-wood-named-fda-chief-counsel>).

<sup>159</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Shirley Ybarra” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>160</sup> Ashley Balcerzak and Niv Sultan, “Trump’s ‘Beachhead’ Teams Host Dozens of Former Lobbyists,” *Huffington Post* (March 23, 2017) (online at [http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists\\_us\\_58d57dc9e4b06c3d3d3e6d8f](http://www.huffingtonpost.com/entry/trumps-beachhead-teams-host-dozens-of-former-lobbyists_us_58d57dc9e4b06c3d3d3e6d8f)); U.S. Senate Lobbying Disclosure Act Database, “Mark Zelden” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.step toe.com/resources-detail-11703.html>).

<sup>161</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Andrew Ackerman and Dave Michaels, “Donald Trump’s Point Man on Financial Regulation: A Former Regulator Who Favors a Light Touch,” *Wall Street Journal* (November 11, 2016) (online at <https://www.wsj.com/articles/donald-trumps-point-man-on-financial-regulation-a-former-regulator-who-favors-a-light-touch-1478860201>).

<sup>162</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Deloitte, “Marshall Billingslea, Director, Deloitte Advisory” (online at [https://www.ncoic.org/images/bios/Marshall\\_Billingslea\\_bio.pdf](https://www.ncoic.org/images/bios/Marshall_Billingslea_bio.pdf)).

<sup>163</sup> “Nancy Beck,” *LinkedIn* (accessed July 17, 2017) (online at <https://www.Linkedin.com/in/nancybbeck/>); Annie Snider and Alex Guillén, “EPA staffers, Trump official clashed over new chemical rules,” *Politico* (June 22, 2017) (online at <http://www.politico.com/story/2017/06/22/trump-epa-energy-chemicals-clash-239875>); American Chemistry Council, “About: Member Companies” (online at <https://www.americanchemistry.com/Membership/MemberCompanies/>).

<sup>164</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); John H. Cushman Jr. and Marianne Lavelle, “Trump’s Pick for DOJ Top Environmental Attorney Has a Vast Anti-Climate Record,” *Slate* (June 9, 2017) (online at [http://www.slate.com/articles/health\\_and\\_science/science/2017/06/this\\_is\\_not\\_going\\_to\\_be\\_good\\_for\\_climate\\_change.html](http://www.slate.com/articles/health_and_science/science/2017/06/this_is_not_going_to_be_good_for_climate_change.html)); Kirkland & Ellis LLP, “Jeffrey Bossert Clark-- Partner” (online at <http://www.kirkland.com/sitecontent.cfm?contentID=220&itemID=8568>).

<sup>165</sup> U.S. Department of Homeland Security, “Benjamin L. Cassidy” (online at <https://www.dhs.gov/person/benjamin-l-cassidy>); Al Shaw, Justin Elliot, and Derek Kravtiz, “Here are More than 400 Officials Trump has Quietly Deployed Across the Government,” *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>).

<sup>166</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Ben Protess and Matthew Goldstein, “Trump’s S.E.C. Nominee Disclosure Offers Rare Glimpse of Clients and Conflicts,” *New York Times* (March 8, 2017) (online at <https://www.nytimes.com/2017/03/08/business/dealbook/sec-nominee-jay-clayton-client-list-conflicts-interest.html>).

<sup>167</sup> Matt Egan, “Elizabeth Warren to Trump’s \$285 million Goldman Sachs man: Recuse yourself,” *CNN Money* (February 3, 2017) (online at <http://money.cnn.com/2017/02/03/investing/elizabeth-warren-gary-cohn-goldman-sachs-trump/index.html>).

<sup>168</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>).

<sup>169</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Commodity Markets Council, “Gregg Doud” (online at <http://www.commoditymks.org/about-us/presidents-biography/>).

<sup>170</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Dave Ehrhart,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/dave-ehrhart-29a58710/>).

<sup>171</sup> “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Eric Lipton, “Trump Campaigned Against Lobbyists, but Now They’re on His Transition Team,” *New York Times* (November 11, 2016) (online at <https://www.nytimes.com/2016/11/12/us/politics/trump-campaigned-against-lobbyists-now-theyre-on-his-transition-team.html>).

<sup>172</sup> See Letter from Senator Elizabeth Warren to Secretary Betsy DeVos, March 17, 2017 (online at [https://www.warren.senate.gov/files/documents/2017-3-17\\_Letter\\_to\\_DeVos\\_re\\_ED\\_official\\_hires.pdf](https://www.warren.senate.gov/files/documents/2017-3-17_Letter_to_DeVos_re_ED_official_hires.pdf)).

<sup>173</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Scott Gottlieb,” *LinkedIn* (accessed June 26, 2017) (online at <https://www.Linkedin.com/in/scottgottliebmd/>); Katie Thomas, “F.D.A. Nominee, Paid Millions by Industry, Says He’ll Recuse Himself if Needed,” *New York Times* (March 29, 2017) (online at <https://www.nytimes.com/2017/03/29/health/fda-nominee-scott-gottlieb-recuse-conflicts.html>).

<sup>174</sup> Sarah N. Lynch, “U.S. SEC taps IPO lawyer for Corporation Finance unit,” *Reuters* (May 9, 2017) (online at <http://www.reuters.com/article/us-usa-sec-hinman-idUSKBN1852GJ>); U.S. Securities and Exchange Commission, “William Hinman Named Director of Division of Corporation Finance” (May 9, 2017) (online at <https://www.sec.gov/news/press-release/2017-97>).

<sup>175</sup> “Maren Kasper,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/maren-kasper-933a224/>); Danielle Ivory and Robert Faturechi, “The Deep Industry Ties of Trump’s Deregulation Teams,” *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/2017/07/11/business/the-deep-industry-ties-of-trumps-deregulation-teams.html>); Roofstock, “About Roofstock” (online at <https://www.roofstock.com/about-us>).

<sup>176</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoec.com/resources-detail-11703.html>); “Keith Kellogg,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.Linkedin.com/in/keith-kellogg-1b24b4b5/>); Cubic, “About Us” (online at <https://www.cubic.com/About-Us>); Ben Kamisar, “Trump taps Keith Kellogg for National Security Council post,” *The Hill* (December 15, 2016) (online at <http://thehill.com/homenews/administration/310600-trump-taps-keith-kellogg-for-national-security-council-post>).

<sup>177</sup> Public Citizen, *Corporate Interests Infest Trump Transition at Federal Agencies* (November 29, 2016) (online at <https://www.citizen.org/sites/default/files/trump-landing-team-corporate-interests-report.pdf>); Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoec.com/resources-detail-11703.html>); U.S. Senate Lobbying Disclosure Act Database, “Robert Lighthizer” (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>).

<sup>178</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Trump Transition Team List and Assignments,” publicized by the *New York Times* (November 10, 2016) (online at <https://www.documentcloud.org/documents/3217279-2016-11-10-Transition-Team-List.html>); Russ Choma, “Trump’s Economic Adviser Said the Economy

Was Fine—Right Before It Imploded,” *Mother Jones* (August 5, 2016) (online at <http://www.motherjones.com/politics/2016/08/trump-economic-adviser-said-economy-fine-before-crash/>).

<sup>179</sup> Steptoe & Johnson LLP, “Trump Administration Transition” (December 2016) (online at <http://www.steptoe.com/resources-detail-11703.html>); Derek Kravitz, Al Shaw, Annie Waldman, and Ariana Tobin, “here are the financial disclosures of 349 officials Trump has installed across the government,” *CNBC* (June 6, 2017) (online at <http://www.cnn.com/2017/06/06/here-are-the-financial-disclosures-of-349-officials-trump-has-installed-across-the-government.html>); Danielle Ivory, Robert Faturechi, and Karl Russell, “The Business Links of Those Leading Trump’s Rollbacks,” *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/interactive/2017/07/11/business/conflicts-trump-regulation-rollback-team.html>); Shahien Nasiripour, “Betsy DeVos Hands Victory to Loan Firm Tied to Adviser Who Just Quit,” *Bloomberg* (march 20, 2017) (online at <https://www.bloomberg.com/news/articles/2017-03-20/betsy-devos-hands-victory-to-loan-firm-tied-to-adviser-who-just-quit>); “U.S. Secretary of Education Announces Chief of Staff and Additional Hires,” *U.S. Department of Education* (Apr. 12, 2017) (online at <https://www.ed.gov/news/press-releases/us-secretary-education-announces-chief-staff-and-additional-staff-hires>).

<sup>180</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Ellen Mitchell, “President Trump moves to fill out top ranks at Pentagon,” *The Hill* (April 3, 2017) (online at <http://thehill.com/policy/defense/327099-president-trump-moves-to-fill-out-top-ranks-at-pentagon>).

<sup>181</sup> “Brian McCormack,” *LinkedIn* (accessed July 19, 2017) (online at <https://www.LinkedIn.com/in/brian-mccormack-187b0810/>); Matt Kasper, “New DOE Chief of Staff, Brian McCormack, Played Critical Role in EEI’s Rooftop Solar Campaign,” *Energy and Policy Institute* (online at <http://www.energyandpolicy.org/edison-electric-institute-brian-mccormack-rooftop-solar/>); Danielle Ivory and Robert Faturechi, “The Deep Industry Ties of Trump’s Deregulation Teams,” *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/2017/07/11/business/the-deep-industry-ties-of-trumps-deregulation-teams.html>).

<sup>182</sup> Mike Scarcella, “Treasury GC Pick Brent McIntosh Discloses Big Law Income, Clients,” *National Law Journal* (May 3, 2017) (online at <http://www.nationallawjournal.com/id=1202785159546/Treasury-GC-Pick-Brent-McIntosh-Discloses-Big-Law-Income-Clients>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); “Brent J. McIntosh,” *Sullivan & Cromwell LLP* (online at <https://www.sullcrom.com/lawyers/BrentJ-McIntosh>).

<sup>183</sup> Peter Dreier, “The Worst of Wall Street: Meet Donald Trump’s Finance Chairman,” *The Nation* (May 10, 2016) (online at <https://www.thenation.com/article/the-worst-of-wall-street-meet-donald-trumps-finance-chairman/>); Brad Tuttle, “Here’s Why Treasury Nominee Steve Mnuchin Has Been Called the ‘Foreclosure King,’” *Time Money* (January 19, 2017) (online at <http://time.com/money/4639480/steve-mnuchin-treasury-secretary-foreclosures-onewest/>); Alan Rappeport, “Steven Mnuchin Is Confirmed As Treasury Secretary,” *New York Times* (February 13, 2017) (online at <https://www.nytimes.com/2017/02/13/us/politics/steven-mnuchin-confirmed-treasury-secretary.html>).

<sup>184</sup> McGuireWoods, “Carlos G. Muñiz: Partner” (online at <https://www.mcguirewoods.com/People/M/Carlos-G-Muniz.aspx>); Michael Biesecker & Gary Fineout, “Trump taps lawyer involved with Trump U case for federal job,” *Associated Press* (April 12, 2017) (online at <https://apnews.com/4e4eaba253164b9e88c8f67de504d4d8/trump-taps-lawyer-involved-trump-u-case-federal-job>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).

<sup>185</sup> Office of the Comptroller of the Currency, “Keith A. Noreika” (online at <https://occ.treas.gov/about/who-we-are/comptroller-of-the-currency/keith-noreika.html>); Ben Protes, “Lawyer is Now Regulation Banking Industry He Spent His Career Protecting,” *New York Times* (May 11, 2017) (online at <https://www.nytimes.com/2017/05/11/business/dealbook/keith-noreikala-office-of-the-comptroller-of-the-currency.html>); Robert Schmidt, “Trump’s OCC Chief Will Stay Away from Big Banks to Avoid Conflicts,” *Bloomberg* (June 9, 2017) (online at <https://www.bloomberg.com/news/articles/2017-06-09/trump-occ-chief-will-stay-away-from-big-banks-to-avoid-conflicts>).

- <sup>186</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump's Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Peter Dreier, "The Worst of Wall Street: Meet Donald Trump's Finance Chairman," *The Nation* (May 10, 2016) (online at <https://www.thenation.com/article/the-worst-of-wall-street-meet-donald-trumps-finance-chairman/>); Victoria Finkle, "Trump Picks Former OneWest Chief to Oversee Banks," *New York Times* (June 6, 2017) (online at <https://www.nytimes.com/2017/06/06/business/dealbook/trump-picks-joseph-otting-to-oversee-banks.html>).
- <sup>187</sup> Al Shaw, Justin Elliot, and Derek Kravitz, "Here are More than 400 Officials Trump has Quietly Deployed Across the Government," *ProPublica* (April 28, 2017) (online at <https://projects.propublica.org/graphics/beachhead>); Ben Brody, "Senior White House Advisor Departs for Business Lobby Group," *Bloomberg* (April 12, 2017) (online at <https://www.bloomberg.com/news/articles/2017-04-12/senior-white-house-adviser-departs-for-business-lobbying-group>).
- <sup>188</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump's Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); "David Pekoske," *LinkedIn* (accessed July 5, 2017) (online at <https://www.linkedin.com/in/david-pekoske-22838833/>); "Pae Holding Corp.," *Bloomberg* (online at <https://www.bloomberg.com/profiles/companies/0703638D:US-pae-holding-corp>); "Company Overview of A-T Solutions, Inc.," *Bloomberg* (online at <https://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapid=24044262>).
- <sup>189</sup> Small Business Administration, "Chris Pilkerton" (online at <https://www.sba.gov/offices/headquarters/generalcounsel/leadership/1579666>); Danielle Ivory, Robert Faturechi, and Karl Russell, "The Business Links of Those Leading Trump's Rollbacks," *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/interactive/2017/07/11/business/conflicts-trump-regulation-rollback-team.html>).
- <sup>190</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump's Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); The White House, "President Donald J. Trump Announces Key Administrations Posts" (March 30, 2017) (online at <https://www.whitehouse.gov/the-press-office/2017/03/30/president-donald-j-trump-announces-key-administration-posts>); Isaac Arnsdorf, "Lobbyists abound on Trump transition," *Politico* (November 10, 2016) (online at <http://www.politico.com/tipsheets/politico-influence/2016/11/lobbyists-abound-on-trump-transition-217349>).
- <sup>191</sup> "Lora Ries," *LinkedIn* (accessed July 19, 2017) (online at <https://www.linkedin.com/in/lora-ries-a6ab42a/>); U.S. Senate Lobbying Disclosure Act Database, Search for Lobbyist Name "Lora Ries" (online at <https://soprweb.senate.gov/index.cfm?event=selectFields&reset=1>); Lee Fang, Ali Winston, "Trump Homeland Security Adviser Helped Contractors Profit Off Harsh Deportation Policies," *The Intercept* (December 13, 2016) (online at <https://theintercept.com/2016/12/13/dhs-trump-deportation/>).
- <sup>192</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump's Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); U.S. Department of Transportation, "U.S. Senate Confirms Jeffrey Rosen as Deputy Secretary of U.S. Department of Transportation" (May 16, 2017) (online at <https://www.transportation.gov/briefing-room/dot3717>); Danielle Ivory and Robert Faturechi, "The Deep Industry Ties of Trump's Deregulation Teams," *New York Times* (July 11, 2017) (online at <https://www.nytimes.com/2017/07/11/business/the-deep-industry-ties-of-trumps-deregulation-teams.html>); "Jeffrey A. Rosen," *Care for Crash Victims* (Mar. 2017) (online at <https://www.careforcrashvictims.com/wp-content/uploads/2017/03/JeffreyRosen.pdf>).
- <sup>193</sup> Paul Davidson, "Wilbur Ross: From 'king of bankruptcy' to face of American business," *USA Today* (November 30, 2016) (online at <https://www.usatoday.com/story/money/2016/11/30/wilbur-ross-king-bankruptcy-face-american-business/94674990/>).
- <sup>194</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump's Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)); Christopher Drew, "A Pentagon Test for Boeing's Mr. Fix-It," *New York Times* (April 1, 2017) (online at <https://www.nytimes.com/2017/04/01/business/patrick-shanahan-pentagon-nominee.html>).
- <sup>195</sup> Jackie Wattle, "Under Tillerson, Exxon may have misled investors on climate change, NY claims," *CNN Money* (June 2, 2017) (online at <http://money.cnn.com/2017/06/02/news/companies/exxon-climate-change-rex-tillerson/index.html>); Alexander C. Kaufman, "Exxon Continued Paying Millions To Climate-Change Deniers Under Rex Tillerson," *HuffPost* (Jan. 9, 2017) (online at <http://www.huffingtonpost.com/entry/tillerson-exxon-climate->

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[donations\\_us\\_5873a3f4e4b043ad97e48f52](#)); Zeeshan Aleem, “Donald Trump’s pick for secretary of state is a Putin-friendly Exxon CEO,” *Vox* (Dec. 13, 2016) (online at <https://www.vox.com/2016/12/10/13908108/rex-tillerson-secretary-state-vladimir-putin-exxon-donald-trump>).

<sup>196</sup> Office of Government Ethics, “Certain agency records received in response to PA-17-02” (released June 7, 2017) (online at <https://www.oge.gov/web/OGE.nsf/0/67460009B646BBF88525813800566276/%24FILE/Certain%20agency%20records%20recd%20in%20response%20to%20PA-17-02.pdf>); Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).

<sup>197</sup> Public Citizen, *The Swamp Nominees: Nearly 70% of Trump’s Picks for Top Administration Jobs Have Corporate Ties* (June 21, 2017) (online at [https://www.citizen.org/system/files/case\\_documents/swampnominees0621.pdf](https://www.citizen.org/system/files/case_documents/swampnominees0621.pdf)).