



May 17, 2022

The Honorable James Comer
Ranking Member
Committee on Oversight and Reform
United States House of Representatives
Washington, DC 20515

The Honorable Frank Lucas
Ranking Member
Committee on Science, Space and Technology
United States House of Representatives
Washington, DC 20515

The Honorable Ralph Norman
Ranking Member
Subcommittee on Environment
Committee on Science, Space and Technology
United States House of Representatives
Washington, DC 20515

The Honorable Jay Obernolte
Ranking Member
Subcommittee on Investigations and Oversight
Committee on Science, Space and Technology
United States House of Representatives
Washington, DC 20515

Dear Ranking Member Comer, Ranking Member Lucas, Subcommittee Ranking Member Norman, and Subcommittee Ranking Member Obernolte:

This responds to your letter to the U.S. Office of Government Ethics (OGE) dated April 26, 2022, regarding your request that OGE provide the following information:

1. All financial disclosures, waivers, and recusal documents for political appointees, detailees, fellows, consultants, or contractors previously employed by Eric Schmidt, Schmidt Futures, Google, Alphabet, Twitter, or Facebook.
2. A list of political appointees, detailees, fellows, consultants or contractors on file with OGE that have in the past five years been employed by Schmidt Futures, Google, Alphabet, Twitter or Facebook.

The executive branch ethics program is decentralized by statute and is carried out by each of the nearly 140 agencies in the executive branch.¹ Although OGE leads and oversees the ethics program, it generally does not directly advise, counsel, monitor, or maintain the records for the millions of executive branch employees.² This means that to the extent documents and information exist that are responsive to your request, they are not available from a single source.

Presidentially-appointed, Senate confirmed (PAS) appointees' records (e.g., financial disclosure reports, ethics agreements, ethics pledge waivers, and certificates of compliance) are available through OGE's website. OGE makes the records of Executive Levels I and II PAS officials publicly available for viewing and downloading [here](#). Through a statutorily required

¹ 5 U.S.C. app. §§ 101 *et seq.*

² See 5 C.F.R. § 2638.104 ("Government ethics responsibilities of agency ethics officials.").



request process, OGE makes the records for other individuals whose materials are subject to OGE's review available [here](#).³ Notably, the information contained in these documents reflects compliance with ethics requirements and may not provide all of the information included in your request.⁴

With respect to documents and information about executive branch employees and political appointees whose documents do not come to OGE for review, your request must be directed to the individual's employing agency pursuant to statutory release requirements.⁵

Finally, with regard to documents and information about individuals who are not employees/covered by the executive branch ethics laws and rules, such as contractors, OGE recommends directing your request to the agency receiving the services. OGE does not have authority to collect or maintain information about individuals who serve in these roles in other executive branch agencies.

If you have any questions about the contents of this letter or require additional assistance in locating, accessing, or requesting records via OGE's website, please contact Assistant Counsel Grant Anderson at 202-482-9318.

Sincerely,

Emory A. Rounds, III
Director

³ 5 U.S.C. app. § 105. Records of political appointees whose financial disclosure reports do not come to OGE for review and certification are maintained by the individuals' employing agencies, and must be requested directly from those agencies. If an individual is not listed on OGE's website, OGE does not maintain records for that individual.

⁴ For example, financial disclosure reporting timeframes are two years, which does not align with your inquiry about the past five years of employment. *See* 5 U.S.C. app. § 102(a)(6).

⁵ *See* 5 U.S.C. app. § 105; 18 U.S.C. § 208(d); and 5 U.S.C. § 552a.