



December 27, 2021

The Honorable James Comer  
Ranking Member  
Committee on Oversight and Reform  
United States House of Representatives  
2105 Rayburn House Office Building  
Washington, DC 20515

Dear Ranking Member Comer:

This responds to your letter to the U.S. Office of Government Ethics (OGE) dated November 7, 2021, raising concerns related to the sale of artwork by the President's adult son and requesting that OGE consider opening an investigation into the matters raised.

While OGE is charged with oversight of the executive branch ethics program, its authority is limited to executive branch officers and employees.<sup>1</sup> The ethics laws and rules OGE administers do not apply to individuals who are not executive branch employees, even if they are related to or associated with an executive branch employee.<sup>2</sup> In this situation, because the subject of your concerns is not an executive branch employee, the ethics laws and rules under OGE's jurisdiction do not apply.

I trust that this is responsive to your letter. If you require additional information or have questions, please contact OGE's Chief of Staff, Shelley K. Finlayson, at 202-482-9314.

Sincerely,

Emory A. Rounds, III  
Director

cc: The Honorable Carolyn Maloney, Chairwoman  
Committee on Oversight and Reform  
United States House of Representatives

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<sup>1</sup> 5 U.S.C. app. § 402(a).

<sup>2</sup> Public financial disclosure report filers, including the President, are required to report the financial interests of their dependent children. 5 U.S.C. app. § 102(e)(1). We note that the subject of your concerns is not a dependent; therefore, the reporting requirement would not apply.

