

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

January 20, 2026

Caryl Brzymialkiewicz
Acting Inspector General
Office of the Inspector General
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Acting Inspector General Brzymialkiewicz:

Since we first raised potential conflicts of interest involving Department of the Interior (DOI) Associate Deputy Secretary Karen Budd-Falen and her cattle operations,¹ new evidence has emerged of an undisclosed conflict of interest that demands immediate investigation.² It appears Ms. Budd-Falen may have used her power in the Interior Department to give her family a \$3.5 million windfall by fast-tracking a mining project and letting a multi-billion-dollar corporation skip an environmental review designed to keep communities safe from polluting projects.³

The U.S. Fish and Wildlife Service (FWS) raised serious concerns regarding the mine's impacts on groundwater and endangered species.⁴ Those concerns were disregarded when the agency suddenly, without explanation, changed its stance amid the involvement of senior DOI political appointees, as well as individuals within Ms. Budd-Falen's chain of command.⁵

Karen Budd-Falen, the third-highest-ranking person at DOI, has failed to come clean to Congress about her financial and ethical dealings. On November 18, 2025, we wrote to the Director of the DOI Ethics Office regarding the apparent absence of required public financial disclosure filings for Ms. Budd-Falen following her March 2025 appointment as Associate Deputy Secretary.⁶ In that letter, which is enclosed for your reference, we raised concerns about the prospect of Ms. Budd-Falen retaining ownership interests in a cattle ranching entity disclosed in her 2018 public financial disclosure record, KJM LLC. This was the same

¹ Letter from Hon. Jared Huffman, Ranking Member, H. Comm. on Natural Resources, and Hon. Maxine Dexter, Subcomm. on Oversight and Investigations of the H. Comm. on Natural Resources to Heather Gottry, Director, U.S. Dep't of the Interior, Departmental Ethics Office (November 19, 2025).

² See Jimmy Tobias & Chris D'Angelo, *SCOOP: A Top Trump Official Has Financial Ties To Controversial Nevada Lithium Project*, PUBLIC DOMAIN (Dec. 10, 2025), <https://www.publicdomain.media/p/karen-budd-falen-nevada-lithium-thacker-pass>; Lisa Friedman, *The Trump Administration Approved a Big Lithium Mine. A Top Official's Husband Profited.*, N.Y. TIMES (Jan. 3, 2026), <https://www.nytimes.com/2026/01/03/climate/lithium-mine-interior-karen-budd-falen-water-contract.html>.

³ See Humboldt River Basin Water Authority FAQ, *infra* note 14.

⁴ See *infra* Section II.

⁵ See *infra* Section III; see also U.S. DEP'T OF THE INTERIOR, U.S FISH AND WILDLIFE SERV., *Record of Decision for the Eagle Take Permit Application and Eagle Conservation Plan for the Thacker Pass Lithium Mine Project* (March 2022), <https://www.fws.gov/sites/default/files/documents/ROD-FWS-Thacker-Pass-eagle-permit.pdf>.

⁶ Letter from Hon. Jared Huffman, Ranking Member, H. Comm. on Natural Resources, and Hon. Maxine Dexter, Subcomm. on Oversight and Investigations of the H. Comm. on Natural Resources to Heather Gottry, Director, U.S. Dep't of the Interior, Departmental Ethics Office (November 19, 2025).

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ranching interest that White House ethics officials previously informed Ms. Budd-Falen that she would need to divest if she were to become Director of the Bureau of Land Management (BLM) during the first Trump Administration because “it would be viewed as a potential conflict of interest if she made any decision, even general ones, that benefited ranchers.”⁷

One day after transmitting the November 18 letter, DOI released Ms. Budd-Falen’s 2025 public financial disclosure records to a private party—not to Congress, to whom DOI owes timely and good faith cooperation in the discharge of our oversight obligations.⁸ Those records revealed that Ms. Budd-Falen not only maintains her ownership interest in KJM LLC, but she also disclosed three separate cattle ranching corporations: Home Ranch LLC in Orovada, Nevada; UC Cattle Company LLC in McDermitt, Nevada; and L-F Enterprises LLC in Cheyenne, Wyoming.

Maintaining significant cattle ranching interests while reportedly working on grazing and public lands policy is sufficient, at minimum, to warrant scrutiny for appearance and impartiality concerns. Recently uncovered evidence, however, raises additional serious questions, including whether Ms. Budd-Falen’s financial interests and official activities may have implicated federal ethics and conflict-of-interest restrictions, and possibly violations of federal criminal law.

I. The Sale

One of the ranching entities disclosed by Ms. Budd-Falen—Home Ranch LLC, located in Orovada, Nevada—is situated adjacent to the Thacker Pass lithium mine, which is owned and operated by the Nevada Lithium Corporation. In the Quinn River Basin, where groundwater is over-appropriated,⁹ Home Ranch LLC held valuable groundwater rights that are otherwise scarce in the region.

Those water rights proved to be indispensable to the Nevada Lithium Corporation’s development of the Thacker Pass mine. According to a monitoring plan submitted to BLM, Nevada Lithium Corporation’s access to three wells owned by Home Ranch LLC was critical to “[d]emonstrate compliance with the approved [Plan of Operation] and other federal and state environmental laws and regulations,” including those administered by the FWS and BLM.¹⁰ In addition, construction of the Thacker Pass mine would require about 200 acre-feet of water per year (AFA), after which the mine would need 2,600 AFA to operate.¹¹

⁷ Scott Streater & Michael Doyle, *Controversial Lawyer Named to Key Fish and Wildlife Post*, POLITICO E&E NEWS (Oct. 15, 2018), <https://www.eenews.net/articles/controversial-lawyer-named-to-key-fish-and-wildlife-post>.

⁸ Jimmy Tobias & Chris D’Angelo, *Interior Department Finally Releases High-Ranking Official’s Financial Disclosure*, PUBLIC DOMAIN (Dec. 4, 2025), <https://www.publicdomain.media/p/budd-falen-financial-disclosure-interior>.

⁹ Lena Rueck, *Nevada Passes Two Bills to Preserve the State’s Groundwater for Future Generations*, THE NATURE CONSERVANCY (June 7, 2025), <https://www.nature.org/en-us/newsroom/nevada-groundwater-bills>.

¹⁰ NEVADA LITHIUM CORP., *Thacker Pass Project, Monitoring Plan* (July 2021), https://eplanning.blm.gov/public_projects/1503166/200352542/20023466/250029670/Appendix%20I%20-%20Monitoring%20-%20Final%20Combined_a_508.pdf; see 43 CFR 3809.401(b)(4).

¹¹ Lisa Friedman, *The Trump Administration Approved the Big Lithium Mine. A Top Official’s Husband Profited.*, N.Y. TIMES (Jan. 3, 2026), <https://www.nytimes.com/2026/01/03/climate/lithium-mine-interior-karen-budd-falen>.

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On November 26, 2018, Ms. Budd-Falen's family ranch entered into a Water Rights Purchase Agreement with the Nevada Lithium Corporation.¹² On December 3, 2018, a Memorandum of Agreement memorializing the water rights deal was signed by Ms. Budd-Falen's husband, Frank Falen.¹³ According to local business records, Ms. Budd-Falen and her husband sold 2,500 AFA of water rights to the Nevada Lithium Corporation for \$3.5 million.¹⁴

Since the Nevada Lithium Corporation held only 980 AFA of Quinn River Basin water rights prior to the Home Ranch deal, and since the area in which the company sought to develop the Thacker Pass mine was over-appropriated "by approximately 30,721 AFA," the Thacker Pass mine would simply not move forward without obtaining the water rights belonging to Ms. Budd-Falen's family ranch.¹⁵ In fact, the Nevada Lithium Corporation's water rights fell well short of the 2,600 AFA required for Phase 1 operation and the 5,200 AFA required for Phase 2 of the Thacker Pass lithium mine. Notably, the \$3.5 million deal did not include separate or related arrangements, such as agreements granting the Nevada Lithium Corporation access to private land to drill monitoring wells.¹⁶ Yet an internal company memorandum states that the Nevada Lithium Corporation did, in fact, have the right to drill monitoring wells on property owned by Ms. Budd-Falen's family ranch.¹⁷

Both the structure and timing of the transaction are of particular concern. According to filings with the Securities and Exchange Commission (SEC), after an initial down payment on December 3, 2018, full payment was not completed until November 27, 2023.¹⁸ The Nevada Lithium Corporation was not entitled to own the Home Ranch LLC water rights until Ms. Budd-Falen and her husband were paid the full \$3.5

[water-contract.html](#) (citing U.S. DEP'T OF THE INTERIOR, BUREAU OF LAND MGMT., *Thacker Pass Lithium Mine Project Final Environmental Impact Statement*, at 2-13 (Dec. 4, 2020)).

¹² See Memorandum of Agreement between Home Ranch, LLC & Nevada Lithium Corp. (Dec. 3, 2018), recorded as Instrument No. 2019-02850, Humboldt Cnty., Nev. (on file with the Committee).

¹³ *Id.*

¹⁴ Water Rights Quitclaim Deed from Home Ranch, LLC & UC Land Co., LLC to Nevada Lithium Corp. (Nov. 27, 2023), recorded as Instrument No. 2023-05224, Humboldt Cnty., Nev. (on file with the Committee).

¹⁵ U.S. DEP'T OF THE INTERIOR, BUREAU OF LAND MGMT., *Thacker Pass Lithium Mine Project Final Environmental Impact Statement*, at 2-13 (Dec. 4, 2020).

¹⁶ NEV. STATE ENG'R, Permit to Change the Public Waters of the State of Nevada Heretofore Appropriated (Home Ranch LLC), Permit No. 9000 (Nov. 13, 2023) (noting that the permit to sell Home Ranch LLC's water rights to the Nevada Lithium Corporation "does not extend the permit the right of ingress or egress on public, private, or corporate lands").

¹⁷ Technical Memorandum from [REDACTED] to [REDACTED] and [REDACTED], at 7 (Oct. 23, 2020) (noting the need for "4 stock water wells owned by Home Ranch LLC"); PITEAU ASSOCIATES, Project No. 3989-R19-01, *Baseline Hydrologic Data Collection Report Prepared for Nevada Lithium Corporation*, at 16 (Aug. 2019) (referring to the "Home Ranch West Well" as a well which was monitored by a "72-hour constant rate test in 2018").

¹⁸ Water Rights Purchase Agreement between Home Ranch, LLC & Nevada Lithium Corp. (Nov. 26, 2018), reprinted in 1397468 B.C. Ltd., Annual Report (Form 20-F), Exhibit 4.13 (Apr. 27, 2023), <https://www.sec.gov/Archives/edgar/data/1966983/000106299323018004/exhibit4-13.htm>.

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million.¹⁹ The SEC records also reflect that Nevada Lithium Corporation retained the “sole right, at its discretion, to terminate” the water-rights deal at any time before full payment was made.²⁰

In practical terms, this structure made the successful development and approval of the Thacker Pass mine, over a multi-year period, material to the ability of Ms. Budd-Falen and her husband to obtain the full value of the transaction. Absent completion of an Environmental Impact Statement with FWS and BLM’s subsequent issuance of a Record of Decision approving the mine, Ms. Budd-Falen would not receive the \$3.5 million payment. The Nevada Lithium Corporation would have been aware of that contingency during negotiations, raising questions about whether she used her position at the DOI for self-enrichment.

At the time this transaction was executed, Ms. Budd-Falen served as DOI Deputy Solicitor for Parks and Wildlife. In that capacity, she led the Solicitor’s Division of Parks and Wildlife and was responsible for legal matters involving the National Park Service (NPS) and the FWS. During that time, Ms. Budd-Falen was required by law to file a public financial disclosure, detailing among other things her financial interests, income, and assets.²¹ Despite filing four public financial disclosure records between 2018 and 2021 and identifying Home Ranch LLC as a financial interest, none of these disclosures reflect any transaction between Ms. Budd-Falen’s family ranch and the Nevada Lithium Corporation. Moreover, although her family earned “hundreds of thousands of dollars in initial payments” under the \$3.5 million deal with the Nevada Lithium Corporation, Ms. Budd-Falen’s public financial disclosure reports income from Home Ranch LLC as “None (or less than \$201).”²²

II. The Meeting

On November 6, 2019, according to Ms. Budd-Falen’s official government calendar from her previous tenure at DOI, Ms. Budd-Falen appears to have met in her office, room 6348 at DOI headquarters in Washington, D.C., with representatives from the Nevada Lithium Corporation—the same company that, almost exactly one year earlier, had entered into the multi-million-dollar water rights transaction with Home Ranch LLC.²³

¹⁹ *Id.*

²⁰ *Id.*

²¹ See 5 C.F.R. § 2634.202(c); Letter from Hon. Jared Huffman, Ranking Member, H. Comm. on Natural Resources, and Hon. Maxine Dexter, Subcomm. on Oversight and Investigations of the H. Comm. on Natural Resources to Heather Gottry, Director, U.S. Dep’t of the Interior, Departmental Ethics Office (November 19, 2025).

²² U.S. OFF. OF GOV’T ETHICS, *Public Financial Disclosure Report (OGE 278e) of Karen Budd-Falen* (Jan. 12, 2021) (on file with the Committee).

²³ Jimmy Tobias & Chris D’Angelo, *SCOOP: A Top Trump Official Has Financial Ties To Controversial Nevada Lithium Project*, PUBLIC DOMAIN (Dec. 10, 2023), <https://www.publicdomain media/p/karen-budd-falen-nevada-lithium-thacker-pass>.

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November 6, 2019 Continued
Wednesday

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On Fri, Nov 1, 2019 at 4:09 PM Karen Budd-Falen <karen.budd-falen@sol.doi.gov> wrote:

Next week can we meet to discuss (b) (5)

[REDACTED]
[REDACTED] [REDACTED]

12:00 PM - 1:00 PM

Lunch with Lithium Nevada and Karen Budd-Falen -- Room 6348 at the Main Interior Building, 18th and C Streets

1:00 PM - 1:30 PM

Staff Meeting -- Secretary's Office

While DOI officials may meet with stakeholders for legitimate purposes, context matters. Around this time, the Nevada Lithium Corporation was actively seeking federal approval for its Thacker Pass mine and faced substantial obstacles related to environmental and wildlife protections, including matters implicating the Endangered Species Act and interactions with the FWS, an agency within the portfolio for which Ms. Budd-Falen bore senior legal responsibility in her role as Deputy Solicitor for Parks and Wildlife.

The Nevada Lithium Corporation faced at least three significant obstacles during the federal review process.

First, referring to the Draft Biological Assessment for the Nevada Lithium Corporation's lithium mine, the FWS found that "the effects section [was] lacking" and inadequately considered "impacts to [Lahontan cutthroat trout] and [their] habitat."²⁴ In comments left by FWS on a draft of BLM's Biological Assessment, the FWS suggested that the assessment of the mine was "so limited that we don't even have a thorough grasp of the potential effects prior to purposefully drilling into the aquifer," and further observed that "punching through an aquifer can result in immediate detrimental effect on water quantity, and take of [Lahontan cutthroat trout]."²⁵ FWS concluded that BLM's "effects analysis does not support [the] conclusion" that the Thacker Pass mine is not likely to adversely affect endangered species.²⁶

²⁴ Email from [REDACTED] to [REDACTED] (Sep. 14, 2020) (on file with the Committee).

²⁵ Email from [REDACTED] to [REDACTED] (Dec. 17, 2020) (quoting from BUREAU OF LAND MGMT., HUMBOLDT RIVER FIELD OFF., *Biological Assessment for the Thacker Pass Lithium Mine Project* (September 2020)) (on file with the Committee).

²⁶ *Id.*

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IX. DETERMINATION

Based on the previous analysis, this proposed action is not likely to adversely affect the threatened LCT in Crowley and Pole Creeks. No critical habitat has been designated for LCT, therefore, none will be affected.

However, the groundwater model predicted potential effects to surface water flow (approximately one percent decrease in each creek) that are indiscernible from natural and/or statistical variations. With continued monitoring and reevaluation of the groundwater model, the BLM would like to keep open the opportunity for reinitiating consultation for this project if anything significant is found.

Commented [REDACTED]: Your effects analysis does not support this conclusion at this time.

Commented [REDACTED]: This is an appreciated effort. Is the model so limited that we don't even have a thorough grasp of the potential effects prior to purposefully drilling into the aquifer? If this is the case, then monitoring only shows us there is a problem, but it doesn't prevent it from happening. What will be BLM/NV Lithium's response to the potential "problem"? How much less is ok, and how much is too much? What are the triggers?

Second, concerns regarding the Thacker Pass mine's impacts on endangered species were substantially heightened by FWS hydrological findings. Internal assessments concluded that significant portions of the Draft Environmental Impact Statement prepared for Nevada Lithium Corporation's project were "wholly inadequate," with one individual stating that the "hydrology section of the [Environmental Impact Statement] isn't worth the paper ... it's written on" and that the FWS hydrologist "intends her comments to reflect that position."²⁷ Indeed, the FWS hydrologist left 33 comments on the Draft Environmental Impact Statement and warned of "the potential for significant (or even measurable) dewatering impacts to streams and springs in the Montana Mountains."²⁸ These findings were based, in part, on hydrological tests conducted by Piteau Associates—a geotechnical and water management firm consulting for the Nevada Lithium Corporation—using water wells on property belonging to Ms. Budd-Falen's family ranch, which granted property and well drilling access to the Nevada Lithium Corporation.²⁹ It is not yet known whether or how much Ms. Budd-Falen's family ranch was compensated for this access.

Third, the Nevada Lithium Corporation encountered further resistance when FWS informed the company that it "plans to do an [Environmental Assessment] for the environmental impacts related to issuing an eagle permit."³⁰ This determination was met with evident dissatisfaction from the Nevada Lithium Corporation, which objected that it did "not want to have to pay for writing an [Environmental Impact Statement] plus writing an [Environmental Assessment]."³¹

BLM's response to FWS feedback was escalatory. Rather than engage FWS concerns substantively, BLM characterized FWS feedback as "bizarre," threatened to "press the issue up the chain of command," and emphasized that Nevada Lithium Corporation's project was BLM's first priority and that "everything else will be set aside to get [the project] done."³²

²⁷ Email from [REDACTED] to [REDACTED] and [REDACTED] (July 29, 2020) (on file with the Committee).

²⁸ Technical Memorandum from [REDACTED] to [REDACTED], at 57 (Oct. 8, 2020) (on file with the Committee).

²⁹ PITEAU ASSOCIATES, Project No. 3989-R19-01, *Baseline Hydrologic Data Collection Report Prepared for Nevada Lithium Corporation*, at 16 (Aug. 2019).

³⁰ Email from [REDACTED] to [REDACTED] (May 6, 2020) (on file with the Committee).

³¹ *Id.*

³² Email from [REDACTED] to [REDACTED] et al. (Sep. 15, 2020) (on file with the Committee).

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From: [REDACTED]
Sent: Tuesday, September 15, 2020 9:08 AM
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: Fw: Thacker Pass Draft BA comments

Hey Team,

Just an fyi, we received a (rather bizarre) email response from FWS about the thacker pass draft BA yesterday evening -- bizarre because it is totally not in line with the previous discussions.

[REDACTED] has already scheduled a conference call for Friday with them to find out where they're coming from with this. This is our section's #1 priority, so everything else will be set aside to get this done, as soon as we figure out what happened between the last call and this one. I have already discussed with [REDACTED] that if they aren't being reasonable, we will press the issue up the chain of command -- but we'll talk with them on Friday first, to see what changed between the last discussion and this one.

[REDACTED]

In what follows, the record also suggests that the Nevada Lithium Corporation may have sought leverage through the DOI's legal channels responsible for matters involving FWS.

III. The Approval

Following the November 6, 2019, meeting between Ms. Budd-Falen and the Nevada Lithium Corporation, obstacles confronting the company's Thacker Pass mine appear to have evaporated. Despite clear objections by FWS personnel, FWS issued a letter of concurrence with the BLM effects determination on December 4, 2020.³³ As the Deputy Solicitor responsible for matters involving FWS, Ms. Budd-Falen wielded great power to influence the agency's deliberative process and actions, including by handling "high-profile matters related to the Endangered Species Act, which protects animals and their habitats from extinction."³⁴

For example, internal documents and emails indicate that senior attorneys within the Office of the Solicitor—including personnel who report within Ms. Budd-Falen's chain of command and who advise FWS—were deeply involved in the decision-making process leading to project milestones and approval. Specifically:

³³ U.S. DEP'T OF THE INTERIOR, U.S FISH AND WILDLIFE SERV., *Record of Decision for the Eagle Take Permit Application and Eagle Conservation Plan for the Thacker Pass Lithium Mine Project*, at 4.5.3 (March 2022), <https://www.fws.gov/sites/default/files/documents/ROD-FWS-Thacker-Pass-eagle-permit.pdf>.

³⁴ U.S. DEP'T OF THE INTERIOR, *Division of Parks and Wildlife*, <https://www.doi.gov/solicitor/division-parks-and-wildlife> (last visited Dec. 18, 2025).

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- Upon hearing about FWS' plan to require an Environmental Assessment for the Nevada Lithium Corporation's eagle permit, individuals involved in the project cautioned that "the FWS solicitor has concerns about [the] plan."³⁵
- In December 2019, only a month after Ms. Budd-Falen's meeting with the Nevada Lithium Corporation, a Notice of Intent related to the Thacker Pass Project was structured to require a "signature of the assigned solicitor" and an "SES member with line authority over the project" to "sign and approve it."³⁶
- According to a project schedule, the Office of the Solicitor was responsible for reviewing a "camera-ready" Draft Environmental Impact Statement on April 21, 2020, and reviewing a preliminary Final Environmental Impact Statement on October 9, 2020.³⁷
- On May 13, 2020, an FWS employee informed BLM that "management let me know late yesterday that FWS will not be part of any Thacker Pass [Environmental Impact Statement] decision process," seemingly cutting out FWS from a critical piece for the lithium mine's approval.³⁸
- Internal communications suggest that regional Solicitor's Office personnel handling FWS matters were coordinating directly with senior legal leadership situated in Washington, D.C., during the Thacker Pass review. On June 25, 2020, a regional attorney identified elsewhere as the "PSW Regional Solicitor for FWS"³⁹ requested expedited review materials, asked about the timing of senior-level signoff, and planned "scheduling for briefing with DC."⁴⁰ Given that Ms. Budd-Falen was the senior headquarters legal official responsible for FWS matters at the time, these communications raise the possibility that such coordination may have personally involved her or occurred under her direct authority.

³⁵ Email from [REDACTED] to [REDACTED] (May 15, 2020) (on file with the Committee).

³⁶ Email from [REDACTED] (Dec. 30, 2019) (on file with the Committee).

³⁷ Thacker Pass EIS Schedule (Dec. 17, 2019) (on file with the Committee).

³⁸ Email from [REDACTED] to [REDACTED] and [REDACTED] (May 13, 2025) (on file with the Committee).

³⁹ [REDACTED], *DOI Review Team Scheduling Request for BLM EIS under ASLM* (June 26, 2020) (on file with the Committee).

⁴⁰ Email from [REDACTED] to [REDACTED] et al. (June 25, 2020) (on file with the Committee).

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From: [REDACTED] <[REDACTED]@sol.doi.gov>
Sent: Thursday, June 25, 2020 2:57 PM
To: [REDACTED] <[REDACTED]@blm.gov>; [REDACTED] <[REDACTED]@blm.gov>
Cc: [REDACTED] <[REDACTED]@blm.gov>; [REDACTED] <[REDACTED]@blm.gov>;
[REDACTED] <[REDACTED]@blm.gov>; [REDACTED] <[REDACTED]@sol.doi.gov>
Subject: Re: Thacker - Updated Draft EIS

Hello [REDACTED]

I was wondering if it is possible to get a track changes or redline of the changes? That should speed up review time. Also, what is the time-frame for the surname (I understand it's probably asap, but I don't know when the briefing with SD is). Also, please make sure that I am included on any scheduling for briefing with DC.

Thanks!

[REDACTED]

[REDACTED]

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- According to a summary of a July 2, 2020, meeting between BLM and the Nevada Lithium Corporation, the “FWS solicitor” made “edits on [a] draft document” that were “incorporated into the [Draft Environmental Impact Statement],” including the removal of a Visual Resource Management amendment.⁴¹
- According to a summary of a July 16, 2020, meeting between BLM and the Nevada Lithium Corporation, the Winnemucca BLM field office received comments on the Draft Environmental Impact Statement from FWS solicitors regarding “the [greenhouse gas] analysis.”⁴² These solicitor comments sought to remove an initial finding that the “project would result in increased [greenhouse gas] emissions,” which could have triggered additional environmental review and lawsuits for failure to adequately consider climate impacts of the project.⁴³
- On November 20, 2020, then DOI Assistant Secretary MacGregor held a meeting titled “Thacker Pass Lithium Mine, Stage 5,” at which Principal Deputy Solicitor Dan Jorjani—Ms. Budd-Falen’s superior—participated.⁴⁴ The meeting demonstrates the involvement of high levels of DOI political appointees in decisions involving the Thacker Pass mine.

The Nevada Lithium Corporation ultimately secured a Final Environmental Impact Statement on December 4, 2020, and a favorable Record of Decision for the Thacker Pass lithium mine on January 15, 2021. The final payment associated with the Home Ranch LLC water rights transaction was remitted on November 27, 2023. Taken together, the evidence indicates that Ms. Budd-Falen’s family maintained a substantial

⁴¹ Thacker Pass EIS Bi-weekly Meeting Summary (July 2, 2020) (on file with the Committee).

⁴² Thacker Pass EIS BLM/LNC Bi-weekly Meeting Summary (July 16, 2020) (on file with the Committee).

⁴³ Email from [REDACTED] to [REDACTED] (June 26, 2020) (on file with the Committee).

⁴⁴ Calendar Item, 2:30 PM - 3:15 PM, *Thacker Pass Lithium Mine, Stage 5 (BLM-NV)*, Hon. Katherine MacGregor, Principal Deputy Assistant Sec’y for Land & Minerals Mgmt., U.S. Dep’t of the Interior, at 51 (Nov. 20, 2020).

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financial interest that remained unresolved throughout the federal government’s review of the Nevada Lithium Corporation’s lithium mine, that this potential conflict of interest was not disclosed in accordance with ethics rules, and that this interest coincided with Ms. Budd-Falen’s official responsibilities and contacts concerning the same lithium mine, including her management of legal matters for the FWS.

Although the full extent to which Ms. Budd-Falen participated in or influenced these deliberations remains unclear, the record unequivocally reflects an official meeting between Ms. Budd-Falen and the Nevada Lithium Corporation scheduled during the pending federal review for the Thacker Pass lithium mine, combined with a continuing, multi-million-dollar financial interest tied to the project’s success. These facts raise serious questions regarding Ms. Budd-Falen’s compliance with federal ethics and conflict-of-interest laws and warrant the immediate attention of your office, particularly in light of her ongoing ranching interests and current, reported work on grazing and public lands policy.

As explained in our November 18 letter, federal ethics rules generally prohibit Ms. Budd-Falen from participating in “particular matters involving specific parties” when a person with whom she has a covered relationship is or represents a party.⁴⁵ Additionally, under the relevant criminal statute, Ms. Budd-Falen is generally prohibited from participating personally and substantially in any particular matter, without respect to parties, in which she knows she or other covered individuals—including her husband, Mr. Frank Falen—have a financial interest.⁴⁶ Willful violation of the criminal statute carries up to five years in prison and a \$50,000 fine.⁴⁷ This matter may also implicate the federal conspiracy statute if any person, including Mr. Frank Falen, coordinated with Ms. Budd-Falen to violate the federal criminal conflict-of-interest statute.⁴⁸

On December 12, 2025, Committee staff contacted the DOI regional solicitor involved in the Thacker Pass mine to clarify the extent of their work with Ms. Budd-Falen. Regional Solicitor [REDACTED] informed Committee staff that he would not respond. Regional Solicitor [REDACTED] explained that this refusal was based on instructions from DOI headquarters. Notably, [REDACTED] did not assert any privilege or other legal basis for withholding information.

The Department’s decision to release relevant records to a private entity while not providing those same records in response to our November 18 letter, as well as its subsequent instructions directing DOI personnel not to answer our inquiries, appears to reflect obstruction of our constitutional oversight obligations. As the D.C. Circuit has explained, “it would be an inappropriate intrusion into the legislative sphere” to treat “only the chairman of a committee” as “the official voice of the Congress for purposes of receiving such information, as distinguished from its ranking minority member.”⁴⁹

Contrary to DOI’s absurd claim that these are “baseless accusation[s],” the facts demand the kind of full and complete examination of executive abuse that Congress intended when it established the DOI’s Office

⁴⁵ 5 CFR § 2635.502.

⁴⁶ 18 U.S.C. § 208(a).

⁴⁷ 18 U.S.C. §§ 216(a)(2), 216(b).

⁴⁸ 18 U.S.C. § 371.

⁴⁹ *Murphy v. Dep’t of the Army*, 613 F.2d 1151, 1157 (D.C. Cir. 1979).

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of the Inspector General (OIG) in 1978.⁵⁰ While the Supreme Court has given President Trump a virtual free pass to abuse the public's trust to enrich himself, public corruption by those he installs in federal agencies is still unlawful. Therefore, to discharge both our constitutional oversight responsibilities and your office's statutory obligations to "prevent and detect fraud and abuse" and "to keep ... Congress fully and currently informed ... concerning fraud and other serious problems,"⁵¹ we are referring the evidence we have gathered and ask that you investigate the matter, including:

- 1) Since Ms. Budd-Falen elected to retain her cattle ranching interests after reentering federal service in March 2025, whether those financial interests require divestment, recusal, or screening under applicable ethics rules and, if so, whether the applicable ethics rules were appropriately identified, implemented, and followed with respect to matters she has or currently works on or oversaw, including grazing and public lands policy;
- 2) Whether Ms. Budd-Falen was required, under applicable ethics or financial disclosure requirements, to disclose the \$3.5 million water rights transaction between her family ranch, Home Ranch LLC, and the Nevada Lithium Corporation;
- 3) The use of any intermediary, escrow, or third-party mechanism in connection with the \$3.5 million water-rights transaction between Home Ranch LLC and Nevada Lithium Corporation, and whether that structure obscured, delayed, or otherwise affected the disclosure or assessment of her financial interest for ethics purposes;
- 4) Whether Ms. Budd-Falen personally and substantially participated in any particular matters related to Thacker Pass that had a direct and predictable effect on her or her spouse's financial interests;
- 5) Whether Ms. Budd-Falen used, or allowed the use of, her official position or supervisory authority within DOI to influence any agency's legal review, interagency coordination, or decision-making related to the Thacker Pass project;
- 6) Whether Ms. Budd-Falen used, or allowed the use of, her official position or supervisory authority within the DOI or Office of the Solicitor to influence, directly or indirectly, the negotiation of terms of the water rights deal with the Nevada Lithium Corporation related to the Thacker Pass mine project;
- 7) Whether Ms. Budd-Falen's November 6, 2019, meeting with the Nevada Lithium Corporation was consistent with federal ethics rules, given her financial interests and the pendency of federal approvals for the Thacker Pass mine;

⁵⁰ Lisa Friedman, *The Trump Administration Approved a Big Lithium Mine. A Top Official's Husband Profited.*, N.Y. TIMES (Jan. 3, 2026), <https://www.nytimes.com/2026/01/03/climate/lithium-mine-interior-karen-budd-falen-water-contract.html> (quoting Aubrie Spady, a spokeswoman for the DOI who also declined to say whether Ms. Budd-Falen played a role in the approval of the lithium mine).

⁵¹ Inspector General Act of 1978, Pub. L. No. 95-452, § 2, 92 Stat. 1101, 1101, 1102 (1978).

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- 8) Whether agency processes during the Thacker Pass review, particularly the handling of FWS concerns, were conducted impartially, or were legal, managerial, or political actions taken to narrow, sideline, or override substantive FWS objections;
- 9) Whether the facts point to violations of federal conflict-of-interest statutes, including 18 U.S.C. § 208, or related statutes concerning coordination or misuse of office; and
- 10) Whether any DOI officials took actions, either with respect to Ms. Budd-Falen's financial disclosure records or in responding to congressional inquiries regarding her financial relationship with the Nevada Lithium Corporation, that were intended to delay, frustrate, or limit congressional oversight or public disclosure. If so, by whom and under whose direction?

We further request that the OIG take appropriate steps to ensure the preservation of relevant records, including: ethics records and opinions; screening and recusal documentation; calendars and visitor logs; emails and other paper or electronic messaging records; drafts and comment matrices for National Environmental Policy Act or Endangered Species Act documents; communications between DOI, BLM, FWS, and the Nevada Lithium Corporation; records reflecting the negotiation, execution, and payment of the water rights transaction and any related agreements; and any other relevant records.

We stand ready to provide supporting documentation and to coordinate with your office as appropriate. Please contact the House Natural Resources Committee's Subcommittee on Oversight and Investigations minority staff at (202) 225-6065 with any questions about this request. I look forward to your prompt response.

Sincerely,



Jared Huffman
Member of Congress
Ranking Member,
Committee on Natural Resources



Maxine Dexter
Member of Congress
Ranking Member,
Subcommittee on Oversight and Investigations

U.S. House of Representatives
Committee on Natural Resources
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November 19, 2025

Ms. Heather Gottry
Director
Departmental Ethics Office
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Dear Ms. Gottry:

We write to you regarding the apparent absence of legally required public financial disclosure records for Karen Budd-Falen, who assumed the role of Associate Deputy Secretary of the Department of the Interior (DOI) in March 2025. As of October 2025, documents reviewed by the Committee indicate that the DOI Ethics Office has no record of any public financial disclosure filing for Ms. Budd-Falen since her reentry to the federal government, despite a clear obligation to disclose her financial interests under federal law and applicable federal ethics requirements. This is well beyond any reasonable filing window. Whether this failure reflects intentional non-filing by Ms. Budd-Falen or the Department's refusal to produce public records, the public's right to know her financial interests are being denied. Financial disclosure laws exist to preserve the integrity of agency decision-making, prevent conflicts of interest, and ensure that agency officials put the American people first. The DOI falls under the Committee's jurisdiction, and we have an iron-clad responsibility to investigate this matter.

There is no reason to believe Ms. Budd-Falen is unaware of her obligations. She was first appointed on November 5, 2018, to the senior executive service (SES) position of DOI Deputy Solicitor for Fish, Wildlife, and Parks.¹ Under 5 C.F.R. § 2634.202, SES officials are considered "public filers" and must file a public financial disclosure within 30 days of assuming office unless they served in a covered position in the preceding 30 days.² Ms. Budd-Falen did not hold such a position before her 2018 appointment and, therefore, was required to file as a new entrant. Indeed, on November 27, 2018, she filed an OGE Form 278e, a standard form used to disclose the financial interests of covered executive branch officials.³ After leaving federal service on January 20, 2021, Ms. Budd-Falen returned to private employment at Budd-Falen Law Offices, LLC, in Cheyenne, Wyoming.⁴

¹ Scott Streater & Michael Doyle, *Controversial lawyer named to key fish and wildlife post*, POLITICO E&E NEWS (Oct. 15, 2018), <https://www.eenews.net/articles/controversial-lawyer-named-to-key-fish-and-wildlife-post>.

² 5 C.F.R. § 2634.202(c) (defining the term "public filer" to include "Each office or employee in the executive branch ... whose position is classified above GS-15 of the General Schedule").

³ U.S. OFF. OF GOV'T ETHICS, *Public Financial Disclosure Report (OGE Form 278e) of Karen-Budd Falen* (Nov. 27, 2018) (on file with the Committee).

⁴ See *Karen Budd-Falen, Senior Partner*, THE FALLEN LAW OFFICES L.L.C., <https://www.buddfalen.com/karen-budd-falen> (last visited Oct. 22, 2025). Notably, Ms. Budd-Falen's biography page on the Falen Law Offices website was locked since the Committee last reviewed the page. An archived version of the page reviewed by the Committee is still available. See *Karen Budd-Falen, Senior Partner*, WAYBACK MACHINE, <https://web.archive.org/web/20250715040925/https://www.buddfalen.com/karen-budd-falen> (last visited Nov. 17, 2025).

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In March 2025, Ms. Budd-Falen reentered federal government service as Associate Deputy Secretary,⁵ an SES position requiring public disclosure of her financial interests.⁶ Because she had been out of covered service for more than 30 days, she was once again required to file a public financial disclosure by April 2025 as a new entrant. Extenuating circumstances can sometimes cause delays in the submission of a filing, which is why 5 C.F.R. § 2634.201(g) allows up to two extensions of 45 days each. However, even in the event that she was granted the maximum allowable extension, Ms. Budd-Falen would have been required to file no later than July 2025.⁷ On October 2, 2025, the DOI Ethics Office received an official request to produce the latest OGE Form 278e for Ms. Budd-Falen, as well as other public financial disclosure records. On October 6, 2025, the DOI Ethics Office responded to this request and said they “do not have records responsive to [the] request.”⁸

All available evidence indicates that so far Ms. Budd-Falen and the Trump Interior Department have failed to produce public financial disclosure records to which the American people are entitled. Either Ms. Budd-Falen’s records exist and the Department “must make [them] available” within 30 days of receipt as required by law,⁹ or the records do not exist several months after the deadline, in which case we are compelled to question whether Ms. Budd-Falen has declined to file. Ms. Budd-Falen owes to the American people an immediate and public disclosure of her financial interests.

As a Trump appointee who has previously filed a financial disclosure, Ms. Budd-Falen should be well aware of her obligation to file. Assuming Ms. Budd-Falen knowingly and willfully failed to file, Ms. Budd-Falen must be referred to the Department of Justice, which could result in fines up to \$75,540.¹⁰ In addition to her personal legal liability, Ms. Budd-Falen’s delinquency also now exposes agency actions she worked on to litigation, and possibly invalidation.¹¹ For example, according to private documents reviewed by the

⁵ Michael Doyle, ‘Cowboy attorney’ said to be saddling up for a return to DC, POLITICO E&E NEWS (Mar. 5, 2025), <https://www.eenews.net/articles/cowboy-attorney-said-to-be-saddling-up-for-a-return-to-dc>.

⁶ U.S. GEN. ACCT. OFF., B-290233, *Appointment of Department of the Interior Associate Deputy Secretary*, at 1 (Oct. 22, 2002) (“The position of DOI Associate Deputy Secretary ... is classified as a Senior Executive Service ‘general’ position”), www.gao.gov/assets/b-290233.pdf.

⁷ 5 C.F.R. § 2634.201(g) (providing that an ethics official may, for good cause shown, grant up to two 45-day extensions, for a maximum of 90 days).

⁸ Email from Departmental Ethics Off., Dep’t of the Interior (Oct. 6, 2025) (on file with the Committee).

⁹ 5 C.F.R. § 2634.603(c) (providing that “Each agency will, within 30 days after any public report is received by the agency, permit inspection of the report by, or furnish a copy of the report to, any person who makes written application as provided by agency procedure...”).

¹⁰ 5 C.F.R. § 2634.701; *see* 5 U.S. Code § 13106.

¹¹ Even in the absence of a criminal finding under 18 U.S.C. § 208, an Administrative Procedure Act claim may persist. For example, a court may invalidate an agency decision either if it finds that an agency’s actions were based on an official’s undisclosed, improper, or self-serving interests rather than the merits, or if it finds that the official’s failure to follow legally required ethics rules was a prejudicial procedural error that compromised the integrity of the process. *See Motor Vehicle Mfrs. Assn. of United States v. State Farm Mut. Automobile Ins. Co.*, 463, U.S. 29, 43 (1983) (standing the proposition that a court must vacate an agency’s decision under the arbitrary and capricious standard if the agency “relied on factors which Congress had not intended it to consider”); *see also Ass’n of Nat’l Advertisers v. FTC*, 627 F.2d 1151, 1170, 1174 (D.C. Cir. 1980) (noting that parties “have a right to ... an impartial decision maker” and agency officials engaged in rulemaking may be disqualified “when there has been a clear and

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Committee, it appears that Ms. Budd-Falen has worked on sweeping revisions to new and modified Resource Management Plans to expand livestock grazing and oil and gas drilling, rewriting longstanding grazing rules which have protected federal lands for over a quarter-century, and reducing the amount of public lands that would qualify to be protected as Areas of Critical Environmental Concern.¹² In addition to advancing rollbacks of regulations involving wild horses and burros, the National Environmental Policy Act, the Endangered Species Act, and the National Historic Preservation Act, Ms. Budd-Falen's involvement appears to have also extended to a restructuring of DOI's appeals process by packing its review boards with extractive industry representatives and revising the "substantial compliance" standard of review for the Office of Hearings and Appeals.¹³

Your office's immediate attention to Ms. Budd-Falen's missing records is even more urgent given the overlap between her previously disclosed financial interests and work she appears to have undertaken since her appointment potentially affecting her financial interests. During the first Trump Administration, Ms. Budd-Falen's public financial disclosure revealed a 33 percent ownership interest in KJM, LLC,¹⁴ a cattle ranch registered in Wyoming valued between \$1 and \$5 million, generating between \$15,001 and \$50,000 in income.¹⁵ Notably, before joining DOI in 2018 as Deputy Solicitor, she was considered for the position of Director of the Bureau of Land Management.¹⁶ At the time, White House ethics officials informed Ms. Budd-Falen that she would need to divest from her cattle ranch in Big Piney, Wyoming, because, in her own words, "it would be viewed as a potential conflict of interest if she made any decision, even general ones, that benefited ranchers."¹⁷

Given that Ms. Budd-Falen described divestment from her cattle ranch as "a ridiculous bridge too far" and chose to retain her ownership interest, it is concerning that Ms. Budd-Falen's reentry to the federal government seemingly includes work on such matters that, by her own admission, could pose a conflict of interest.¹⁸ Owning a cattle ranch does not inherently preclude Ms. Budd-Falen from public office, but it does require thorough public disclosure and adherence to recusal obligations—like any other business interest—to ensure that Ms. Budd-Falen discharges her official duties for the benefit of the American people, not her personal financial interest. However, if Ms. Budd-Falen chose to retain her ownership interest in KJM, LLC, while serving as Associate Deputy Secretary and failed to satisfy those disclosure

convincing showing that the agency member has an unalterably closed mind on matters critical to the disposition of the proceeding").

¹² Information on file with the Committee.

¹³ *Id.*

¹⁴ U.S. OFF. OF GOV'T ETHICS, *Public Financial Disclosure Report (OGE Form 278e) of Karen-Budd Falen*, at 7, 10 (Nov. 27, 2018) (on file with the Committee).

¹⁵ WYO. SEC'Y OF STATE, *Limited Liability Company Annual Report - KJM, LLC* (Nov. 22, 2024), <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=042089070123204003018046122010184030128252072119>.

¹⁶ Scott Streater & Michael Doyle, *Controversial lawyer named to key fish and wildlife post*, POLITICO E&E NEWS (Oct. 15, 2018), <https://www.eenews.net/articles/controversial-lawyer-named-to-key-fish-and-wildlife-post>.

¹⁷ *Id.*

¹⁸ *Id.*

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and recusal obligations, it would suggest that she could be using her public office to benefit the same industry in which she holds a financial interest.¹⁹

Public records confirm that Ms. Budd-Falen's potential conflicts have appreciably grown since she last filed. According to court records, she represented the Wyoming Stock Growers Association and Wyoming Wool Growers Association as late as March 17, 2025.²⁰ News reports indicate that since Ms. Budd-Falen left the federal government in January 2020, she also represented the New Mexico Cattle Growers Associations and Montana Stockgrowers Association.²¹ Except for the New Mexico Cattle Growers Association, none of these clients were listed in Ms. Budd-Falen's 2018 public financial disclosure filing. Under federal ethics rules, Ms. Budd-Falen is generally prohibited from participating in "particular matters involving specific parties" when a person with whom she has a covered relationship, such as a former client, is or represents a party.²² Additionally, under the relevant criminal statute, Ms. Budd-Falen is generally prohibited from participating personally and substantially in any particular matter, without respect to parties,²³ in which she knows she or other covered individuals have a financial interest.²⁴ The penalty for willful violation of the criminal statute carries up to five years in prison and a \$50,000 fine.²⁵

It is unclear to the Committee how the DOI Ethics Office could possibly assess new covered relationships or conflicts, as required by law, without a public financial disclosure filing by Ms. Budd-Falen. The OGE Form 278e is a crucial document used by federal ethics offices to inform ethics guidance and recusal obligations for public filers, such as Ms. Budd-Falen.²⁶ We hope your office shares our concern that an individual, "who frequently represents ranching and farming groups, private landowners[,] and local

¹⁹ According to some public documents, it appears Ms. Budd-Falen may have retained her 33% ownership interest in KJM, LLC. See Memorandum from Dan Keppen, Executive Director, Family Farm Alliance, to San Luis & Delta-Mendota Water Authority Directors (April 7, 2025) (noting that "Ms. Budd-Falen grew up on a Wyoming ranch and still owns it"),

https://www.sldmwa.org/OHTDocs/pdf_documents/Meetings/Board/Prepacket/AgendaItem18b_FFA_Update_April_2025.pdf.

²⁰ See Mot. to Withdraw as Counsel of WSGA and WWGA, *Iron Bar Holdings v. Cape*, No. 23-8034, ECF No. 121 (10th Cir. Mar. 17, 2025).

²¹ *Montana Ranchers, Officials Appeal Bison Grazing on U.S. Land*, AP (Aug. 29, 2022), <https://flatheadbeacon.com/2022/08/29/montana-ranchers-officials-appeal-bison-grazing-on-u-s-land>; Rachel Gabel, *Another round of USFS sniper operations proposed to remove cattle*, THE FENCE POST (Jan. 12, 2023), <https://www.thefencepost.com/news/another-round-of-usfs-sniper-operations-proposed-to-remove-cattle>.

²² 5 C.F.R. § 2635.502.

²³ The "particular matter" standard "covers a broader range of Government activities than 'particular matter involving specific parties.'" OFF. OF GOV'T ETHICS, *Informal Advisory Letter 6 x 29*, at 5 (Oct. 4, 2006). In addition to party matters, it covers particular matters of general applicability, such as policies or regulations applicable only to companies in a discrete industry, e.g., grazing policies affecting cattle ranchers. *Id.*, 8.

²⁴ 18 U.S.C. § 208. Covered individuals, other than Ms. Budd-Falen, include her "spouse, minor child, general partner, [or] organization in which [s]he is serving as officer, director, trustee, general partner or employee." 18 U.S.C. § 208(a).

²⁵ 18 U.S.C. § 216.

²⁶ See generally U.S. OFF. OF GOV'T ETHICS, *Public Financial Disclosure: A Reviewer's Reference* 2d ed., at 4-1, 4-2, 14-1 – 14-15 (2004), https://www.govinfo.gov/content/pkg/GOVPUB-Y3_ET3-PURL-LPS57672/pdf/GOVPUB-Y3_ET3-PURL-LPS57672.pdf.

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governments in land use matters,” appears to be working on these same matters for the DOI, yet no record of her public financial disclosure filing exists nearly a year after her appointment.

Pursuant to Rule X of the Rules of the House of Representatives, the Committee on Natural Resources has broad jurisdiction to conduct oversight of the Department of the Interior, and we are committed to ensuring that financial disclosure laws are thoroughly enforced. Accordingly, to assist with our oversight obligations, please provide the following documents and information as soon as possible but no later than 5:00 p.m. on December 4, 2025:

1. The complete set of Ms. Budd-Falen’s 2025 public financial disclosure records, including but not limited to:
 - a. OGE Form 278e;
 - b. All OGE Form 278-T records;
 - c. All certificates of divestiture under 5 C.F.R. § 2634.1001 (hereinafter “Certificates of Divestiture”); and
2. All documents and communications from March 1, 2025, to November 19, 2025, involving the DOI Ethics Office referring or relating to deadline extension requests, reviews, or decisions about any financial disclosure for Ms. Budd-Falen, including but not limited to any records maintained under 5 C.F.R. § 2634.201(g).
3. All documents and communications from March 1, 2025, to November 19, 2025, involving the DOI Ethics Office referring or relating to Ms. Budd-Falen, including OGE Form 278e, OGE Form 278-T, and Certificates of Divestiture.

Please contact the Natural Resources Committee Subcommittee on Oversight and Investigations minority staff at (202) 225-6065 with any questions about this request. I look forward to your prompt response to this important oversight request.

Sincerely,



Jared Huffman
Member of Congress
Ranking Member,
Committee on Natural Resources



Maxine Dexter
Member of Congress
Ranking Member,
Subcommittee on Oversight and
Investigations