

Written Testimony of

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before

Members of the House Committee on Homeland Security

on

**“The Ultimate Grift: How DHS Is Enriching the
President and His Allies at Taxpayer Expense”**

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Ranking Member Thompson and Members of the Committee,

Thank you for the opportunity to speak with you today. My name is Jon Golinger. I work for Public Citizen as the Democracy Advocate where I investigate corporate influence on elections and government, push to strengthen political and lobbying disclosure, and advocate for policies around money and politics.

Public Citizen is a national public interest organization with more than 1 million members and supporters. For more than 50 years, Public Citizen has advocated for stronger consumer protection and to fight fraud; for corporate and government accountability; and for ethics and honest government measures to combat graft and corruption.

The Committee is right to train its sights on corruption and the potential abuse and misuse of taxpayer dollars in the awarding of government contracts at the Department of Homeland Security. Corruption is not a victimless crime – corruption costs us all. When corruption is directed at the government, taxpayers are ripped off, legitimate and necessary government work may go unperformed and public services may not be effectively rendered, program integrity is compromised, and people’s faith in government to fairly steward their tax dollars is destroyed.

In the awarding of government contracts to private businesses to provide goods and services, corruption of the contract awarding process also strikes a dagger directly into the heart of a free and fair marketplace. It punishes American businesses for doing the hard work and playing by the rules while financially rewarding bad actors for violating them. Corruption in government contracting is anti-competitive, costly, and corrosive and the American people pay the price.

From my experience investigating public corruption cases, I learned that corruption in the government contracting and purchasing process – aka procurement fraud – is perennially at the top of the list of targets for those both outside and inside of government who seek to wrongfully enrich themselves. Why target government contracting? According to the GSA Office of Inspector General’s Procurement Fraud Handbook, “each year, potentially billions of dollars in federal funds are lost as a result of procurement fraud.”¹ Put another way, as bank robber Willie Sutton explained when asked why he robbed banks: “Because that’s where the money is.”²

As you will hear from other witnesses testifying here today, in the Trump Administration, the Department of Homeland Security is where the money is. Shady revelation after shady revelation has piled on top of the mountain of evidence that hundreds of millions, and potentially billions of

¹ Procurement Fraud Handbook, U.S. General Services Administration Office of Inspector General, Office of Audits (Dec. 2012); https://www.gsaig.gov/sites/default/files/misc-reports/ProcurementFraudHandbook_0.pdf

² “History of the FBI – Famous Cases and Criminals”; <https://www.fbi.gov/history/famous-cases/willie-sutton>

dollars in DHS contracts have been handed out like candy on Halloween to companies tied to the people who run DHS.³ The cloud of corruption hovering over the DHS contracting process last year was a gathering storm that has now begun to burst.

CONTRACTING CORRUPTION CONCERNS

I want to focus my testimony here today on two specific areas of concern that have fueled questions about DHS contracting corruption over the last year and inform ways that Congress can take action to combat it in the months and years ahead: 1) Corey Lewandowski's role and 2) the \$240 million DHS advertising campaign called "Stronger Borders, Stronger America."

1. Corey Lewandowski's Role at DHS

Corruption, or even just the appearance of corruption, corrodes the public trust that serves as the very foundation of American government's ability to function. That's why, "when taking an official action (e.g., making decisions or recommendations), American public servants are expected to put the government's interests ahead of their own."⁴ To ensure this happens, safeguards to prevent unethical dealings and self-interested decisions – in addition to outright bribery – are fundamental to a healthy American government.

Unfortunately, during its first year in office, the Trump Administration effectively circumvented key anti-corruption safeguards in order to quickly install individuals with potentially major conflicts of interest into high-level government jobs. It did so by transforming the discrete, limited government employment designation known as "Special Government Employee" (SGE) into a vehicle for an end run around ethics requirements, evading barriers against self-dealing and eliminating transparency.

Early in the first year of the Trump Administration, a Public Citizen report I authored found that, in addition to Elon Musk, the Trump Administration deployed the SGE designation to place at least a dozen individuals in high-level roles in federal agencies who otherwise may not have been willing or able to be in those roles.⁵ Since the SGE designation enables the appointed officials to be exempt from

³ "DHS fast-tracked \$1 billion contract to pro-Trump donor's company," Washington Post, 12/17/25; <https://www.washingtonpost.com/politics/2025/12/17/dhs-contract-trump-donor/>; "Homeland Security Department Fast-tracked \$1 Billion Contract to Politically Connected Company that Obtained Inside Information," Public Citizen, 12/17/25; <https://www.citizen.org/news/homeland-security-department-fast-tracked-1-billion-contract-to-politically-connected-company-that-obtained-inside-information/>

⁴ "Financial Disclosure: Identifying and Remediating Conflicts of Interest in the Executive Branch," Congressional Research Service, 5/30/23; <https://www.congress.gov/crs-product/IF11904>

⁵ "Isn't That Special? The Trump Administration's Use of 'Special Government Employees' Raises Conflict-of-Interest and Ethics Risks that go way beyond Elon Musk," by Jon Golinger, Public Citizen, 4/17/25; <https://www.citizen.org/article/isnt-that-special/>

important conflict of interest rules and transparency requirements, these maneuvers created ethical minefields. In Mr. Lewandowski's case, those ethical mines appear to have exploded.

The SGE statutory category of federal employment was created by Congress in 1962 and signed into law by President John F. Kennedy as part of a comprehensive revision of the conflict of interest laws.⁶ SGEs were created to be a time-limited designation to enable the federal government to take advantage of the knowledge and skills of outside experts while allowing them to remain employed in the private sector.⁷ According to the Office of Government Ethics, the SGE designation is “a way to apply an important, but limited, set of conflict-of-interest requirements to a group of individuals who provide important, but limited, services to the Government.”⁸ Historically, the vast majority of SGEs have served as members of federal advisory boards, task forces, or committees.⁹

By law, an SGE is an officer or employee in the executive branch of the federal government appointed to perform temporary duties, with or without compensation, for no more than 130 days in a 365 day period.¹⁰ Any day on which an SGE is either paid by the Government for their service or a day on which the SGE conducts more than de minimis work for the government is counted towards one of the SGE's 130 days of service.¹¹

According to the Office of Government Ethics, “many agencies use SGEs, either as advisory committee members or as individual experts or consultants, to provide expertise or perspectives that might be unavailable among an agency's regular employees. Often because of their expertise, these SGEs have substantial outside activities and financial interests that may raise difficult ethics questions.”¹²

SGEs are subject to most federal government ethics rules, although sometimes in a

⁶ Pub. L. No. 87-849, 76 Stat. 1119 (1962)

⁷ 18 U.S.C. § 202; “Conflict of Interest and the Special Government Employee,” Office of Government Ethics, 2/15/00; [https://www.oge.gov/Web/oge.nsf/Legal%20Docs/445ECB1FB63809DA852585BA005BED9E/\\$FILE/00x1.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/445ECB1FB63809DA852585BA005BED9E/$FILE/00x1.pdf?open)

⁸ *Id.*

⁹ “Opportunities Exist to Improve Data on Selected Groups of Special Government Employees,” U.S. Government Accountability Office, July 2016; <https://www.gao.gov/assets/d16548.pdf> (“Federal agencies made limited use of special government employees (SGE) not serving on federal boards. As of December 2014, approximately 3 percent of SGEs (1,138 of 40,424) were working as experts or consultants and not serving on federal boards, according to the Office of Government Ethics”)

¹⁰ 18 U.S.C. § 202; Under 18 U.S.C. § 202(a), an SGE is an officer or employee “who is retained, designated, appointed, or employed to perform, with or without compensation, for not to exceed one hundred and thirty days during any period of three hundred and sixty-five consecutive days, temporary duties either on a full-time or intermittent basis.”

¹¹ “Counting Days of Service for Special Government Employees,” Legal Advisory from the Office of Government Ethics, 10/30/24;

[https://www.oge.gov/Web/oge.nsf/Legal%20Docs/F24F83CD5FDBFA6D85258BC6004B8C21/\\$FILE/LA-24-14%20-%20SGE%20Day%20Counting.pdf?open](https://www.oge.gov/Web/oge.nsf/Legal%20Docs/F24F83CD5FDBFA6D85258BC6004B8C21/$FILE/LA-24-14%20-%20SGE%20Day%20Counting.pdf?open)

¹² “Ethics Laws Applicable to Special Government Employees,” Office of Government Ethics;

<https://extapps2.oge.gov/Training/OGETraining.nsf/xsp/.ibmmodes/domino/OpenAttachment/training/ogetraining.nsf/D006291C1FEC02448525869C005BD4B8/Body/EthicsLawsApplicabletoSGEs.pdf>

significantly less restrictive way.¹³ While the laws against bribery¹⁴, compensation for representational services¹⁵, and post-employment lobbying¹⁶ generally apply to SGEs in the same manner as to regular government employees, the main conflict of interest statute¹⁷ in practice applies quite differently.¹⁸ This is a difference with a distinction.

Under existing law, due to their time-limited service in a niche role, SGEs have been permitted to be broadly exempted from the divestiture of conflicting interest requirements and allowed to participate in matters that directly and substantially affect their financial interests – as long as those matters do not have a unique impact on the SGE or the SGE’s former or current employer other than as part of a general industry or class of persons.¹⁹ In addition, despite the increased risks of self-dealing, biased advice, and distorted decision-making that may arise from these exemptions, SGEs have not been required to publicly disclose their financial interests unless they are both classified above the GS-15 level of federal employment and serve over 60 days. All SGEs must file financial disclosure statements, but most of them are subject only to confidential disclosure.²⁰

In the case of Mr. Lewandowski, we know from government documents made public during court proceedings that Mr. Lewandowski – despite being brought into DHS not as the actual official chief of staff but as a temporary and limited SGE – was given the high-ranking title of “Chief Advisor” within DHS.²¹ An internal DHS policy document from February 2025 shows agency officials, including Corey Lewandowski – designated “Chief Advisor,” and Kristi Noem — referred to on the document as “S1,” signing off on a policy change.²² Lewandowski was the last official listed at the end of the document next to Noem.

Given this high-level role, and DHS’s acknowledgement that Mr. Lewandowski had worked for a substantial number of days as an SGE, last August, Public Citizen filed a FOIA request for a copy of Mr. Lewandowski’s SF-50 - Standard Form 50 Notification of Personnel Action form so that we could see the details of his government role and for a copy of his financial disclosure report. The DHS Office of

¹³ “Summary of Government Ethics Rules for Special Government Employees,” U.S. Department of Justice, updated 11/13/23; <https://www.justice.gov/jmd/ethics/summary-government-ethics-rules-special-government-employees>

¹⁴ 18 U.S.C. §201

¹⁵ 18 U.S.C. §203 and §205

¹⁶ 18 U.S.C. §207

¹⁷ 18 U.S.C. §208

¹⁸ “Ethics Rules, or Lack Thereof, that Apply to ‘Special Government Employees’ (SGE) and Elon Musk, in Particular,” by Craig Holman, Ph.D., Public Citizen, 2025; <https://www.citizen.org/article/ethics-rules-or-lack-thereof-that-apply-to-special-government-employees-sge-and-elon-musk-in-particular/>

¹⁹ *Id.*

²⁰ 5 C.F.R. § 2634.904(a)(2) (requiring SGEs to file confidential disclosures); See also 5 C.F.R. §§ 2634.202(h); 2634.204; 2634.205 (exempting certain SGEs from public disclosure requirements); see also “Ethics For An Outsourced Government,” Kathleen Clark, 3/10/11; https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1840629

²¹ DHS Record of Clearance and Approval, 25-07536; Case 3:25-cv-01766-EMC; <https://archive.org/details/gov.uscourts.cand.444868/gov.uscourts.cand.444868.154.4.pdf>

²² *Id.*

General Counsel told NBC News that Lewandowski submitted a financial disclosure form to the agency and, a DHS spokesperson said in a statement that Mr. Lewandowski “completed all of the required Office of Government Ethics forms, including a full financial disclosure and any investments by his family.”²³ However, DHS has to-date declined to publicly disclose Mr. Lewandowski’s financial disclosure report, citing his status as an SGE. Therefore, the nature and extent of Mr. Lewandowski’s finances, including his sources of income, investments, and clients or business partners he is involved with are entirely unclear because he has declined to publicly disclose them. The list of serious questions about whether Mr. Lewandowski has improperly benefited from his DHS work continues to grow by the day, in part because Mr. Lewandowski has refused to release his financial disclosure report.

Here are some things we do know:

- Mr. Lewandowski has a consulting company called “Lewandowski Strategic Advisors,” a Delaware Limited Liability Company.²⁴
- In 2024, Mr. Lewandowski’s company received \$265,500 in payments for “management and strategic consulting” from the American Resolve Policy Fund, a non-profit closely associated with Kristi Noem.²⁵ We do not know who the donors to this nonprofit entity were in 2024 – or in 2025 – because they are not required to disclose them publicly under IRS rules. If Mr. Lewandowski continued to receive income from this entity during his 2025 tenure at DHS, it’s important to determine whether DHS contractors or potential contractors contributed money to this entity. One thing we do know: a POGO investigation found that at least one big DHS contractor, William Walters, donated \$10,000 in October 2024 to a related entity, the American Resolve PAC, a SuperPAC.²⁶ This same SuperPAC has also paid Mr. Lewandowski’s company thousands of dollars.²⁷

²³ “Democrats launch new inquiry into Corey Lewandowski,” NBC News, 3/23/26; <https://www.nbcnews.com/politics/immigration/democrats-launch-new-inquiry-corey-lewandowski-rcna264690>; “Lewandowski’s veto power over DHS contracts frustrates admin officials: ‘Corey is part of the problem’,” Politico, 8/27/25; <https://www.politico.com/news/2025/08/27/tk-00527043>

²⁴ “Lewandowski Strategic Advisors,” File Number 6409161, incorporated 5/12/17, Delaware Dept. of State Division of Corporations; <https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx> (search conducted 3/23/26); Consulting Agreement between FirstEnergy Corp. and Lewandowski Strategic Advisors, signed by “Corey R. Lewandowski, Partner,” dated 6/28/17; <https://www.washingtonpost.com/documents/675d3612-a2cc-40cb-9cc1-5d46152d6de0.pdf>

²⁵ “Kristi Noem’s company was paid almost \$140,000 by a pro-Noem group in 2024,” CREW, 1/16/26; <https://www.citizensforethics.org/reports-investigations/crew-investigations/kristi-noems-company-was-paid-almost-140000-by-a-pro-noem-group-in-2024/>; American Resolve Policy Fund, 2024 IRS Form 990; <https://www.citizensforethics.org/wp-content/uploads/2026/01/american-resolve-policy-fund-2024-990.pdf>

²⁶ “Unraveling the Corporate Ties to DHS’s ‘Big, Beautiful Jet’,” POGO Investigates, 3/10/26; <https://www.pogo.org/investigates/unraveling-the-corporate-ties-to-dhss-big-beautiful-jet>; American Resolve PAC, Inc. Federal Election Commission filing; <https://docquery.fec.gov/cgi-bin/fecimg/?202412179739930100>

²⁷ <https://projects.propublica.org/527-explorer/expenditures/87004183>

- Lewandowski’s business connections have also raised questions.²⁸ For example, Lewandowski faced questions²⁹ when his associate David Bossie was criticized for allegedly raking in \$18.5 million for an entity called the Presidential Coalition, which reportedly fooled senior citizens³⁰ into thinking they were helping Trump-aligned candidates, when instead a large chunk of the funds went to buy books Bossie had co-authored with Lewandowski.³¹
- During Trump’s first term, Lewandowski faced calls for an ethics investigation for failing to register as a foreign agent or lobbyist.³² It is especially concerning that someone with this kind of history was put into a position of immense power and shielded from transparency and conflict of interest laws through his designation as an SGE.

2. The \$240 million DHS advertising campaign “Stronger Borders, Stronger America”

From its inception in February 2025³³, the massive DHS advertising and marketing campaign called “Stronger Borders, Stronger America” raised bright red flags because of its scale, how it was awarded, who it was awarded to, and what it did.³⁴ This contract was at the heart of bipartisan Congressional hearings into Noem last month. The question is who paid and who benefited?

a. *Unprecedented \$240 million scale*

The “Stronger Borders, Stronger America” advertising campaign for media buying, production and ad development services was initially awarded on February 13, 2025 at

²⁸ “The untold reason Kristi Noem’s alleged lover Corey Lewandowski did ‘whatever the f–k I want’ at DHS,” NY Post, 3/11/26; <https://nypost.com/2026/03/11/us-news/why-kristi-noem-aide-corey-lewandowski-thought-he-could-do-whatever-the-fk-he-wanted-at-dhs/>

²⁹ “‘Can I Count on You?’ How the Presidential Coalition Has Capitalized on its Leader’s Ties to the President and Mised Donors,” 5/5/19, Campaign Legal Center; <https://campaignlegal.org/document/profitting-proximity-report-presidential-coalitions-misleading-fundraising-practices>

³⁰ “Trump campaign distances itself from David Bossie over alleged scam,” Politico, 5/7/19; <https://www.politico.com/story/2019/05/07/trump-campaign-david-bossie-1309709>

³¹ “Scoop: Inside a top Trump adviser’s fundraising mirage,” Axios, 5/5/19; <https://www.axios.com/2019/05/05/david-bossie-fundraising-presidential-coalition>

³² “Is Corey Lewandowski Violating Lobbying and Foreign Agents Registration Laws?” Public Citizen, 5/3/17; <https://www.citizen.org/news/is-corey-lewandowski-violating-lobbying-and-foreign-agents-registration-laws-public-citizen-calls-for-investigation/>; “Amid Presidential Access Questions, Former Trump Campaign Manager Quits Lobbying Firm,” NPR, 5/5/17; <https://www.npr.org/2017/05/05/527062471/amid-presidential-access-questions-former-trump-campaign-manager-quits-lobbying>

³³ “DHS Announces Nationwide and International Ad Campaign Warning Illegal Aliens to Self-Deport and Stay Out,” 2/17/25; <https://www.dhs.gov/news/2025/02/17/dhs-announces-ad-campaign-warning-illegal-aliens-self-deport-and-stay-out>

³⁴ Letter from Rep. Bennie Thompson and Rep. Gerald Connolly to Noem, 3/21/25; https://democrats-homeland.house.gov/imo/media/doc/2025-03-21-t-secretarynoem-request_for_response_on_trump_border_ad_campaign.pdf

an “estimated total value” of \$200 million.³⁵ Government spending records show that the ad campaign’s contract ceiling was increased in September 2025 to \$220 million and then again in November 2025 to \$240 million.³⁶ According to news reports, besides military recruiting efforts and Covid-19-related campaigns, the DHS ads were the most expensive U.S. government marketing campaign in the last 10 years.³⁷

b. Not competitively bid

This massive contract was not competitively bid using the standard full and fair competition process designed to ensure that American taxpayers receive the best product at the best price. Instead, the contract document stated that: “The Department of Homeland Security (DHS), Office of Procurement Operations (OPO), on behalf of the Office of DHS Public Affairs office intends to limit competition to three contractors based on other than full and open competition.”³⁸

To justify this lack of a full competitive bid, the contract document cited President Trump’s declaration of a national border emergency, and stated: “a delay in effectively communicating accurate and timely information will allow illegal border crossings to continue to rise, increasing the potential for a humanitarian crisis at the border and within the country. To reduce any delays to the rapid release of these critical communications, a limiting competition is needed. A limited competition preserves the intent of the Competition in Contracting Act while permitting the Government to quickly solicit and award a contract by using a reduced pool of vendors that are positioned, based on available resources and capabilities, to respond to this immediate need.”³⁹

c. Politically-connected contractors and subcontractors

According to contract documents, DHS limited the “competition” for this massive advertising contract to just three contractors, all of whom were run by Republican political operatives: Safe America Media, People Who Think, and a third contractor that did not receive contract funding whose name is redacted on the contract document. According to a news report, this third firm is Knox Strategies, the firm of a onetime spokeswoman for now-FBI Director Kash Patel.⁴⁰

³⁵ <https://sam.gov/workspace/contract/opp/73477226ef6b4bd093263512124126e9/view>

³⁶ https://www.usaspending.gov/award/CONT_IDV_70RDA225D00000004_7001

³⁷ “Political operatives with Trump ties raked in millions of dollars in commissions from DHS ad campaign,” Politico, 3/19/26; <https://www.politico.com/news/2026/03/19/dhs-ad-money-companies-00834791>; “Noem Ad Blitz Benefits Media Firms Linked to Trump Campaigns,” Bloomberg News, 3/5/26;

<https://www.bloomberg.com/news/features/2026-03-06/noem-dhs-ad-blitz-benefits-firms-linked-to-trump-campaigns>

³⁸ <https://sam.gov/workspace/contract/opp/73477226ef6b4bd093263512124126e9/view>

³⁹ *Id.*

⁴⁰ “Docs Show DHS Specifically Steered \$200M Ad Contracts, Raising Questions About Noem’s Testimony,” Daily

In a recent interview, former DHS Assistant Secretary for Public Affairs Tricia McLaughlin said that the “Department of Homeland Security chose Safe America, which is run by two storied, prolific professionals, Patrick McCarthy and Mike McElwain. And then they did the domestic piece of this and then the international piece was done by People Who Think, Jay Connaughton.”⁴¹

Both Safe America Media and People Who Think have deep ties to political operatives.

Safe America Media was formed last February just a few days before it was awarded \$143 million of the limited-bid contract.⁴² Safe America Media is listed at the same address as that of veteran Republican operative, Michael McElwain, who has long had his own advertising company, Designated Marketing Media (DMM Media).⁴³ On the DHS ad contract, Safe America Media reportedly received a 12 percent commission for domestic advertising, totaling at least \$15.2 million.⁴⁴

People Who Think was co-founded by Jay Connaughton, who did work for Trump’s 2016 campaign and appears to have worked as recently as October 2023 with Lewandowski in the campaign of Jeff Landry for governor of Louisiana.⁴⁵ People Who Think was awarded \$77 million of the limited-bid DHS advertising contract and reportedly received at least \$7.7 million from its 10 percent commission.⁴⁶

Wire, 3/5/26; <https://www.dailywire.com/news/docs-show-dhs-specifically-steered-200m-ad-contracts-raising-questions-about-noems-testimony>

⁴¹ Tricia McLaughlin interview on the Scott Jennings Show, 3/13/26 (minute 1:53 – 2:10); <https://x.com/JenningsShow/status/2032520657116738009>

⁴² “Democrats are probing companies awarded a \$220 million ad contract for ties to Noem, Lewandowski,” NBC News, 3/6/26; <https://www.nbcnews.com/politics/trump-administration/noem-lewandowski-democrats-probing-companies-220-million-ad-contract-rcna262156>; “Firm using Alexandria address wins \$220M federal contract for Trump immigration ads,” ALX Now, 10/22/25; <https://www.alxnow.com/2025/10/22/firm-using-alexandria-address-wins-220m-federal-contract-for-trump-immigration-ads/>

⁴³ “Firm Tied to Kristi Noem Secretly Got Money From \$220 Million DHS Ad Contracts,” ProPublica, 11/14/25; <https://www.propublica.org/article/kristi-noem-dhs-ad-campaign-strategy-group>

⁴⁴ “Political operatives with Trump ties raked in millions of dollars in commissions from DHS ad campaign,” Politico, 3/19/26; <https://www.politico.com/news/2026/03/19/dhs-ad-money-companies-00834791>

⁴⁵ “Political operatives with Trump ties raked in millions of dollars in commissions from DHS ad campaign,” Politico, 3/19/26; <https://www.politico.com/news/2026/03/19/dhs-ad-money-companies-00834791>; “DHS expedites process to award two Republican-linked firms part of its \$200-million ad campaign,” LA Times, 3/10/25; <https://www.latimes.com/politics/story/2025-03-10/dhs-expedites-process-to-award-two-republican-linked-firms-part-of-its-200-million-ad-campaign>

⁴⁶ “Firm Tied to Kristi Noem Secretly Got Money From \$220 Million DHS Ad Contracts,” ProPublica, 11/14/25; <https://www.propublica.org/article/kristi-noem-dhs-ad-campaign-strategy-group>; “Political operatives with Trump ties raked in millions of dollars in commissions from DHS ad campaign,” Politico, 3/19/26; <https://www.politico.com/news/2026/03/19/dhs-ad-money-companies-00834791>

Earlier this month, Senators Peter Welch and Richard Blumenthal requested information from companies involved in producing and placing one of the major DHS advertisements under this contract that featured Noem riding a horse at Mount Rushmore to shed light on the details of expenditures made under the \$240 million DHS ad contract.⁴⁷ According to documents received by the Senators, a subcontractor for Safe America Media named the Strategy Group Company, which is led by the husband of Noem’s then-spokesperson and Assistant Secretary for Public Affairs Tricia McLaughlin, spent funds it received for advertising production work on the following, per invoices provided to and publicly disclosed by the Senators⁴⁸:

- \$107,405 Labor costs to The Strategy Group Company
- \$60,000 “Signing bonus” to The Strategy Group Company
- \$52,599* Videography, photography, and production vendors
- \$20,000* Horse rentals
- \$3,781* Hair and makeup services
- \$500 Magic Makers, Inc., *a magic store based in Sioux Falls, SD*
- \$41,852 Other vendors _____

**Amounts reflect identifiable vendors.*

A RECIPE FOR REFORM: SUNLIGHT AND OVERSIGHT

The potential conflict of interest and transparency concerns raised by the kind of SGE appointment Mr. Lewandowski received to become “Chief Advisor” at DHS are manifold. Under existing law, the public has no way to know whether SGEs – either in DHS or in other agencies - who don’t file public financial disclosure reports or are empowered to oversee themselves are putting the people’s interests ahead of their own. Urgent reform is needed to ensure that anti-corruption rules apply to high-level SGEs just as they do to regular federal employees, strengthen conflict-of-interest barriers to prevent financial self-dealing or misuse of insider information, and shine sunlight with financial disclosure so the public knows who has been given the power and privilege of doing the people’s business.

These SGE-specific reforms must:

⁴⁷ “Firm Tied to Kristi Noem Secretly Got Money From \$220 Million DHS Ad Contracts,” ProPublica, 11/14/25; <https://www.propublica.org/article/kristi-noem-dhs-ad-campaign-strategy-group>

⁴⁸ “Welch, Blumenthal Release Details on DHS Secretary Noem’s Mount Rushmore Ads,” 3/23/26; <https://www.welch.senate.gov/welch-blumenthal-release-details-on-dhs-secretary-noems-mount-rushmore-ads/>; The Strategy Group Social Media Post, 3/3/26; <https://x.com/StrategyGroupCo/status/2028931636314710113> (“We had a subcontract with Safe America for limited production services. Safe America paid us \$226,137.17 total for 5 film shoots, 45 produced video advertisements and 6 produced radio advertisements.”)

- Prevent Undue Influence:
 - Apply the standard financial conflicts-of-interest code, 18 U.S.C. 208, to all Special Government Employees. SGEs who serve in powerful roles should not be exempt from financial conflicts prohibitions designed to prevent self-dealing and protect American taxpayers.
 - Prohibit all SGEs from having any role in reviewing, approving, or “weighing in” on government contracts.
 - Prohibit non-advisory committee SGEs who own, direct, or have a major investment in a large for-profit company from communicating with any agency or office that has government contracts with, regulates, or has a pending investigation into or enforcement action against the SGE’s company.
- Let The Public See Who’s An SGE:
 - Direct the Office of Government Ethics to maintain a publicly available database that contains the name of non-advisory committee SGEs, the date they were first appointed, a rolling tally of the number of work days they’ve been an SGE, and a description of why they are an SGE rather than a regular federal employee.
- Shine Sunlight on Financial Conflicts:
 - The default should be that all non-advisory committee SGEs should file public financial disclosure reports.
 - Require SGEs who claim an exemption from filing a public report to have their exemption claim reviewed by the relevant agency ethics office to ensure that exemption is properly applied.

Beyond SGE reforms to address the concerns about Mr. Lewandowski’s role, Congress should take action to significantly increase the transparency and oversight of the DHS contracting and expenditure process in the months and years ahead. Those broader DHS contracting reforms must:

- Remove political appointees from government contracting. Federal regulations already require agencies to award contracts “with complete impartiality and with preferential treatment for none.”⁴⁹ It is difficult to judge whether the specific contracts of concern ran afoul of those rules, because agencies have given so little detail about them. But we do know that

⁴⁹ <https://www.acquisition.gov/far/3.101-1>

at least there is at least the appearance that political appointees – rather than career professionals – interfered in various and detrimental ways in DHS contracting.

- Ban political appointees from interfering in any way with the DHS contracting process. Require DHS contract career officials to log all contacts with DHS political appointees regarding prospective DHS contract awards. Require those logs to be immediately accessible upon request to Congress, the media, and the public to deter and detect improper interference with the contracting process.
- Create an enforceable Code of Ethics for DHS Officials. To avoid even the appearance of impropriety, all DHS officials should be required to conserve and protect government resources, act with impartiality, avoid acting when private interests may conflict with official duties, decline gifts even when they may be accepted, and report suspected fraud, waste, and abuse whenever it is detected.
- Create a dedicated DHS Contracting Whistleblower Hotline outside DHS. Enable DHS contract officials within the agency to safely report improper political interference with the contracting process, kickbacks or improper gifts or payments, or waste and abuse by creating a dedicated whistleblower hotline for DHS contracting officials outside of DHS.
- Create a DHS Contracts Watch List. All DHS contracts that include any of the concerning components of the \$240 million ad contract – substantially large amounts, limited or no competition, urgently awarded, for advertising – should be placed on a “Watch List” and require heightened scrutiny and disclosure. Within 30 days following the contract award, the relevant Congressional oversight committees should receive a report detailing how and why the contract was awarded and who the selected vendors are.
- No Appearance of Nepotism for DHS Subcontractors. Prohibit DHS contractors from hiring any subcontractor who has a family, personal, or financial relationship with a DHS official.
- Congress should dedicate resources to staff a “DHS Contracts Watch” to strengthen Congress’s oversight role, including monitoring USASpending.gov for contracts of concern, initiating inquiries to request information, and conducting regular oversight hearings.