

Project 2025, Already Known For Radical Far-Right Ideologues, Is Also Stacked With Industry Lobbyists And Consultants Pushing Unprecedented Deregulations

SUMMARY: Project 2025, the extreme MAGA blueprint led by influential right-wing stalwart the Heritage Foundation, is known for an ideologically-driven push to—as its director Paul Dans says—“[flood the zone with conservatives](#)” in the next administration. In a [radical departure](#) from traditional conservative policy prescriptions of tax cuts and deficit reduction, Project 2025 is most known for its mission to gut what it calls “deep state” bureaucracy by [dismantling or defunding major executive branch agencies](#), including the departments of Education, Commerce, and Justice.

A new Accountable.US review reveals that, lurking among Project 2025’s more purely ideologically-driven figures, its authors include a wide range of lobbyists and private-sector consultants who are using the cover of the MAGA movement to push unprecedented deregulatory policies:

- **Department of Labor:** Author Jonathan Berry, a managing partner who focuses on “labor, employment, and benefit policy” at leading anti-regulatory law firm Boyden Gray PLLC, was the “top policy official” at the notoriously anti-worker Trump DOL. Notably, Berry takes credit for \$10 billion in regulation cuts as well as industry-friendly rules on overtime and the joint employer standard.
 - Berry’s most extreme new policy prescriptions include granting states waivers from the Fair Labor Standards Act and National Labor Relations Act, allowing minors to do “inherently dangerous jobs,” exempting small businesses from federal labor rules “where possible,” blocking DOL’s enforcement of sex discrimination against LGBTQ workers, and striking down a key executive order to rein in discrimination among federal contractors.
- **Department of Transportation:** Author Diana Furchtgott-Roth advised controversial anti-regulatory Trump DOT Secretary Elaine Chao and is currently president of an advisory services firm that frequently pushes pro-industry energy positions on behalf of an undisclosed “select group of clients.”
 - Furchtgott-Roth’s most extreme recommendations include cutting public transit funding and relying on private rideshare services; breaking up the Federal Aviation Administration (FAA); gutting fuel economy standards; rolling back “Vision Zero” efforts to reduce traffic fatalities; and repealing “foundational” maritime shipping law the Jones Act.
- **Small Business Administration:** Author Karen Kerrigan is the longtime president of the Small Business & Entrepreneurship Council (SBE Council), which has spent at least \$480,000 on federal lobbying during the Biden Administration working to influence an array of federal policies. Kerrigan has loudly criticized Biden for “tax hikes,” “regulatory directives,” and “government micromanagement.”
 - Kerrigan’s chapter controversially claims that the SBA’s Office of Advocacy can be “a powerful weapon” in obstructing all other agencies’ rules, while complaining that SBA has been “hyperfocused” on inclusivity and protection of disproportionately-harmed communities, calling them “politically favored.”
- **Department of Energy:** Author Bernard L. McNamee helps clients on “high-stakes” issues as a partner at the Biglaw firm McGuireWoods, where he also serves as Senior Advisor for the firm’s

consulting and lobbying practice. Their many clients include energy corporation Dominion Resources, which has paid the practice \$670,000 over the course of the Biden Administration.

- McNamee’s chapter, which claims the Biden DOE has created “a new energy crisis” through “extreme ‘green’ policies,” calls for eliminating major DOE offices that work on energy efficiency and net-zero carbon goals, as well as explicitly demanding more funding for nuclear warhead deployment and ending nonproliferation efforts.
- **Environmental Protection Agency:** Author Mandy M. Gunasekara, former Chief of Staff for Trump’s aggressively pro-industry EPA, is currently a principal for a consulting firm “dedicated to providing curated solutions to meet the business and communications objectives” of its clients.
 - Gunasekara’s radical policy prescriptions call for a “major reorganization” of EPA’s Office of the Administrator and a “Day One executive order” to halt and/or review central EPA activities, claiming the agency pushed an “economy-destroying agenda” and has been infiltrated by “embedded activists.”
- **The White House Office:** Author Rick Dearborn, Trump’s former Deputy Chief of Staff who is likely to play an influential role in a potential conservative administration, is now a partner at major lobbying firm Mindset. Dearborn has directly lobbied for corporate giants including Amazon Web Services, Citigroup, Meta Platforms, Shell USA, and Verizon.
- **Department of Veterans Affairs:** Author Brooks D. Tucker is currently listed as a lobbyist for the Spectrum Group. In this role, he has lobbied on behalf of Loyal Source, a U.S. Customs and Border Protection (CBP) contractor that has faced widespread scrutiny for “years of deficient medical care,” including the death of a child in CBP custody.
- **Intelligence Community:** Dustin Carmack, who authored Project 2025’s chapter on the Intelligence Community, is Director Of Public Policy for Meta Platforms, focusing on 19 states in the southern and southeastern U.S.

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The Radical MAGA Project 2025 Would Dismantle Or Gut Key Executive Branch Agencies In The Next Conservative Administration.

The Radical MAGA Project 2025 Would Gut Key Executive Branch Agencies, Including The Justice, Education, Commerce, And Homeland Security Departments In The Next Conservative Administration.

Project 2025, Led By The Conservative Heritage Foundation, Is A Radical MAGA Plan To “Roll Back Nothing Less Than 100 Years” Of “Liberal Encroachment” Through The Administrative State—The Plan Proposes To “Defund The Department Of Justice, Dismantle The FBI, Break Up The Department Of Homeland Security And Eliminate The Departments Of Education And Commerce.” “In truth, the program laid out by Dans and his fellow Trumpers, called Project 2025, is far more ambitious than anything Ronald Reagan dreamed up. Dans, from his seat inside The Heritage Foundation, and scores of conservative groups aligned with his program are seeking to roll back nothing less than 100 years of what they see as liberal encroachment on Washington. They want to overturn what began as Woodrow Wilson’s creation of a federal administrative elite and later grew into a vast, unaccountable and mostly liberal bureaucracy (as conservatives view it) under Franklin Roosevelt’s New Deal and Lyndon Johnson’s Great Society, numbering about two and a quarter million federal workers today. They aim to defund the Department of Justice, dismantle the FBI, break up the Department of Homeland Security and eliminate the Departments of Education and Commerce, to name just a few of their larger targets. [...] And they want to ensure that what remains of this slashed-down bureaucracy is reliably MAGA conservative — not just for the next president but for a long time to come — and that the White House maintains total control of it.” [Politico, [09/19/23](#)]

Project 2025’s Chapter On The Labor Department Was Authored By Jonathan Berry, A Managing Partner At Corporate Law Firm Boyden Gray PLLC Who Was The “Top Policy Official” At The Anti-Worker Trump DOL And Who Took Credit For \$10 Billion In Regulation Cuts And Industry Friendly Rules On Overtime And The Joint Employer Standard.

Project 2025’s Chapter On The Labor Department Was Authored By Jonathan Berry, A Managing Partner At Major Corporate Law Firm Boyden Gray PLLC And Former High-Ranking Policy Official For The Trump Department Of Labor (DOL), Which The AFL-CIO Called “Catastrophic For Workers.”

Jonathan Berry, Managing Partner At Lobbying Firm Boyden Gray & Associates PLLC, Authored The Project 2025 Chapter on The Department Of Labor And Related Agencies. “Jonathan Berry is managing partner at Boyden Gray & Associates PLLC.” [Project 2025, accessed [05/09/24](#)]

**DEPARTMENT OF LABOR
AND RELATED AGENCIES**
Jonathan Berry

[Project 2025, accessed [05/09/24](#)]

Jonathan Berry

Managing Partner

[...]



[Boyden Gray PLLC, accessed [05/09/24](#)]

- **Berry Has Been Managing Partner At Boyden Gray Since April 2023:**

A screenshot of a LinkedIn profile for Jonathan Berry at Boyden Gray. The profile shows a dark blue square logo with 'BG' in white. The text reads: 'Boyden Gray', 'Full-time · 4 yrs 2 mos', 'Washington, District of Columbia, United States'. Below this is a vertical timeline with two entries: 'Managing Partner' (Apr 2023 - Present · 1 yr 2 mos) and 'Partner' (Apr 2020 - Apr 2023 · 3 yrs 1 mo).

[LinkedIn profile for Jonathan Berry, accessed [05/09/24](#)]

- **Boyden Gray PLLC Is “A Premier Law And Strategy Firm,” Representing Clients On Regulatory Policy, Administrative Law, And Other Matters.** “Boyden Gray PLLC is a premier law and strategy firm, providing clients with advice and representation on matters of constitutional and administrative law, regulatory policy, and international affairs.” [Boyden Gray PLLC, accessed [05/09/24](#)]
- **May 2023: C. Boyden Gray, Boyden Gray PLLC’s Namesake, Died—He “Personified The Conservative Legal Establishment” And Played A Prominent Role In The Conservative Movement Since The Reagan Administration.** “C. Boyden Gray, who personified the conservative legal establishment as a lawyer involved in judicial appointments, policy, diplomacy or fund-raising for every Republican president since Ronald Reagan, died on Sunday at his home in the Georgetown section of Washington. He was 80.” [The New York Times, [05/21/23](#)]

At The Trump Labor Department, Berry Oversaw “All Aspects Of Rulemaking And Policy Development” As An Acting / Principal Deputy Assistant Secretary For Policy. “He served as acting Assistant Secretary for Policy at the U.S. Department of Labor, overseeing all aspects of rulemaking and policy development. At the U.S. Department of Justice, he assisted with the development of regulatory policy and with the nominations of Justice Neil Gorsuch and dozens of other judges. He previously served as Chief Counsel for the Trump

transition and earlier clerked for Associate Justice Samuel Alito and Judge Jerry Smith of the U.S. Court of Appeals for the Fifth Circuit. He is a graduate of Yale College and Columbia University School of Law.” [Project 2025, accessed [05/09/24](#)]

- **Berry Was An Acting / Principal Deputy Assistant Secretary For Policy In The Trump Department Of Labor:**



Acting / Principal Deputy Assistant Secretary for Policy

U.S. Department of Labor · Full-time

Apr 2018 – Apr 2020 · 2 yrs 1 mo

Washington, District of Columbia, United States

Head of the regulatory office at Labor; oversaw the development process of dozens of proposed and final rules, including Association Health & Retirement Plans, Joint Employer, and Overtime. As the Regulatory Policy Officer, regularly represented the Department to the Executive Office of the President and the Office of Management and Budget. During tenure, the Office of Information and Regulatory Affairs credited the Department of Labor with over ten billion dollars in deregulatory cost savings for the American public.

[Linkedin profile for Jonathan Berry, accessed [05/09/24](#)]

The AFL-CIO Calls Trump’s Labor Record “Catastrophic For Workers,” Weakening Unions, Rolling Back Labor Rights, Undermining Workplace Safety, And Giving Corporations “Free Rein” To Fight Workers’ Organizing Efforts. “Donald Trump told us in 2016 he would stand with workers. He lied. The difference now is that he has a record he can’t hide from. And that record was catastrophic for workers. Former President Trump spent four years in office weakening unions and working people while pushing tax giveaways to the wealthiest among us. He stacked the courts with judges who want to roll back our rights on the job. He made us less safe at work. He gave big corporations free rein to lower wages and make it harder for workers to stand together in a union.” [AFL-CIO, [09/27/23](#)]

Berry Was The “Top Policy Official” For Trump’s Anti-Worker Labor Secretary Eugene Scalia—Berry Claims DOL Made Over Ten Billion Dollars In Regulatory Cuts During His Tenure And He Was Behind Major Trump Rules On Overtime And The Joint Employer Standard.

Berry Was The “Top Policy Official” For Former Trump Labor Secretary Eugene Scalia, Who Was Called “A Wrecking Ball Aimed At Workers.” “Since his arrival in September, Labor Secretary Eugene Scalia has advanced an assertive deregulatory agenda focusing on ensuring enforcement is consistent and doesn’t unfairly punish well-intentioned employers. An independent contractor regulation is a natural outgrowth of that philosophy, said Jonathan Berry, who was Scalia’s top policy official at DOL through April.” [Boyden Gray PLLC, [07/02/20](#)]

- **Headline: Trump’s Labor Secretary Is a Wrecking Ball Aimed at Workers** [The New Yorker, [10/19/20](#)]

At The Trump Labor Department, Berry Oversaw “All Aspects Of Rulemaking And Policy Development,” And Berry Takes Credit For “Dozens Of Proposed And Final Rules, Including Association Health & Retirement Plans, Joint Employer, And Overtime.” “He served as acting Assistant Secretary for Policy at the U.S. Department of Labor, overseeing all aspects of rulemaking and policy development. At the U.S. Department of Justice, he assisted with the development of regulatory policy and with the nominations of Justice Neil Gorsuch and dozens of other judges. He previously served as Chief Counsel for the Trump transition and earlier clerked for Associate Justice Samuel Alito and Judge Jerry Smith

of the U.S. Court of Appeals for the Fifth Circuit. He is a graduate of Yale College and Columbia University School of Law.” [Project 2025, accessed [05/09/24](#)]

- **While At The Trump Department Of Labor, Berry Takes Credit For “Dozens Of Proposed And Final Rules, Including Association Health & Retirement Plans, Joint Employer, And Overtime”:**



Acting / Principal Deputy Assistant Secretary for Policy

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Apr 2018 – Apr 2020 · 2 yrs 1 mo

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Head of the regulatory office at Labor; oversaw the development process of dozens of proposed and final rules, including Association Health & Retirement Plans, Joint Employer, and Overtime. As the Regulatory Policy Officer, regularly represented the Department to the Executive Office of the President and the Office of Management and Budget. During tenure, the Office of Information and Regulatory Affairs credited the Department of Labor with over ten billion dollars in deregulatory cost savings for the American public.

[Linkedin profile for Jonathan Berry, accessed [05/09/24](#)]

Berry’s Biography Claims That During His Tenure, The Labor Department Was Responsible For “Over Ten Billion Dollars In Deregulatory Cost Savings.” “In government, Mr. Berry headed the regulatory office at the U.S. Department of Labor, where he oversaw the development process of dozens of proposed and final rules. As the Regulatory Policy Officer, he regularly represented the Department to the Executive Office of the President and the Office of Management and Budget. During Mr. Berry’s tenure, the Office of Information and Regulatory Affairs credited the Department of Labor with over ten billion dollars in deregulatory cost savings for the American public.” [Boyden Gray PLLC, accessed [05/09/24](#)]

For Boyden Gray PLLC, Berry “Helps His Clients” Navigate Policy And “Litigates Complex Constitutional And Administrative Law Issues” In Labor, Employment, And Benefits Issues.

For Boyden Gray PLLC, Berry “Helps His Clients Navigate The Emerging Field Of Bureaucratic Overlap In Government, Corporate America, And Capital Markets, Especially In Matters Relating To Environmental, Social, And Governance Factors.” “Jonathan Berry provides strategic counsel and litigates on issues at the intersection of law, politics, and public policy. He helps his clients navigate the emerging field of bureaucratic overlap in government, corporate America, and capital markets, especially in matters relating to environmental, social, and governance factors.” [Boyden Gray PLLC, accessed [05/09/24](#)]

Berry “Litigates Complex Constitutional And Administrative Law Issues And Appeals, Particularly In Labor, Employment, And Benefits Policy.” “Mr. Berry also litigates complex constitutional and administrative law issues and appeals, particularly in labor, employment, and benefits policy.” [Boyden Gray PLLC, accessed [05/09/24](#)]

Berry Also Worked In The Trump Justice Department’s Office Of Legal Policy, Where He Aided The Confirmation Of Supreme Court Justice Neil Gorsuch, Who Was Seen As “A Massive Blow To The Country’s Beleaguered Labor Movement.”

Berry Also Was At The Trump Justice Department’s Office Of Legal Policy, Where “He Assisted With The Confirmations Of Associate Justice Neil Gorsuch,” Who Was Seen As “A Massive Blow To The Country’s Beleaguered Labor Movement.” “Mr. Berry previously served at the Department of Justice’s Office

of Legal Policy, where he assisted with the confirmations of Associate Justice Neil Gorsuch and dozens of other federal judges, and also with the development of the Sessions and Brand memos on proper use of subregulatory guidance documents.” [Boyden Gray PLLC, accessed [05/09/24](#)]

- **Justice Gorsuch’s Potential Confirmation Was Seen As “A Massive Blow To The Country’s Beleaguered Labor Movement.”** “Gorsuch is not only an unimpeachably conservative justice, he’s only 50 years old, meaning he’ll likely have decades on the Supreme Court, where he’ll be able to reshape law in all sorts of fields. One of the most significant results will almost surely be a massive blow to the country’s beleaguered labor movement.” [Vice, [01/16/18](#)]

Jonathan Berry’s Project 2025 Chapter Called For Radical DOL Changes, Including Slashing Protections For Labor Unions; Exempting Religious Employers From Non-Discrimination Laws; Rolling Back Diversity, Equity, And Inclusion Efforts; Restricting Key Labor Agencies; And Even Allowing More Minors To Do “Inherently Dangerous Jobs.”

Berry’s Chapter, Claiming OSHA Abuses Its Inspection Power, Proposed Allowing More Minors To Do “Inherently Dangerous Jobs” And Exempting Certain Small Businesses From OSHA Compliance,

Project 2025 Called For Allowing Children To Perform “Inherently Dangerous Jobs,” With “Parental Consent And Proper Training.” “Hazard-Order Regulations. Some young adults show an interest in inherently dangerous jobs. Current rules forbid many young people, even if their family is running the business, from working in such jobs. This results in worker shortages in dangerous fields and often discourages otherwise interested young workers from trying the more dangerous job. With parental consent and proper training, certain young adults should be allowed to learn and work in more dangerous occupations. This would give a green light to training programs and build skills in teenagers who may want to work in these fields. DOL should amend its hazard-order regulations to permit teenage workers access to work in regulated jobs with proper training and parental consent.” [Project 2025, Chapter 18: Department of Labor, p. 595, [2023](#)]

Project 2025 Called On Congress And The Labor Department To Exempt Small Businesses From OSHA Fines For First-Time, Non-Willful Violators. “Congress (and DOL, in its enforcement discretion) should exempt small business, first-time, non-willful violators from fines issued by the Occupational Health and Safety Administration.” [Project 2025, Chapter 18: Department of Labor, p. 594, [2023](#)]

Project 2025 Called For Focusing On “Health And Safety Inspections On Egregious Offenders,” Claiming That “Other Inspections Are Often Abused.” “Focus health and safety inspections on egregious offenders, as other inspections are often abused and usurp state and local government prerogatives.” [Project 2025, Chapter 18: Department of Labor, p. 615, [2023](#)]

Berry’s Chapter Called On Federal Labor Agencies To Exempt Small Businesses From Federal Regulations “Where Possible,” Called For Exempting Small Businesses From OSHA Fines, And Proposing Limiting NLRB Jurisdiction Over Small Businesses.

Project 2025 Called For Exempting Small Businesses From Federal Regulations. “Exemptions from Regulations for Small Business. Burdensome regulations have anti-competitive effects. In general, larger, higher-margin businesses are better able to absorb the costs of regulatory compliance than are small businesses, and under the Biden Administration, big-business lobbies have affirmatively embraced certain

regulations (such as the COVID vaccine mandate for private employers) to reduce competition from smaller businesses.” [Project 2025, Chapter 18: Department of Labor, p. 594, [2023](#)]

Project 2025 Called On Labor Agencies To Exempt Small Business From Regulations “Where Possible.” “The labor agencies should exercise their available discretion and duties under the Regulatory Flexibility Act to exempt small entities from regulations where possible.” [Project 2025, Chapter 18: Department of Labor, p. 594, [2023](#)]

Project 2025 Called On Congress And The Labor Department To Exempt Small Businesses From Osha Fines For First-Time, Non-Willful Violators. “Congress (and DOL, in its enforcement discretion) should exempt small business, first-time, non-willful violators from fines issued by the Occupational Health and Safety Administration.” [Project 2025, Chapter 18: Department of Labor, p. 594, [2023](#)]

Project 2025 Called On Congress To Limit The Nlrb’s Jurisdiction Over Small Businesses. “Congress should enact legislation increasing the revenue thresholds at which the National Labor Relations Board asserts jurisdiction over employers to match changes in inflation that have occurred since 1935 and better reflect the definition of ‘small business’ used by the federal government.” [Project 2025, Chapter 18: Department of Labor, p. 594, [2023](#)]

Berry’s Chapter Called On The Next Conservative Administration To Limit DOL’s Application Of The Supreme Court Ruling In Bostock V. Clayton County, Which Clarified That Federal Sex Discrimination Laws Protected Persons Who Are Homosexual Or Transgender.

Project 2025 Called On The Next Conservative Administration To Limit The Supreme Court Ruling In Bostock V. Clayton County Which Held That Title Vii’s Sex Discrimination Protections Applied To Someone Who Was Homosexual Or Transgender. “The Biden Administration, LGBT advocates, and some federal courts have attempted to expand the scope and definition of sex discrimination, based in part on the Supreme Court’s decision in Bostock v. Clayton County. Bostock held that ‘an employer who fires someone simply for being homosexual or transgender’ violates Title VII’s prohibition against sex discrimination. The Court explicitly limited its holding to the hiring/firing context in Title VII and did not purport to address other Title VII issues, such as bathrooms, locker rooms, and dress codes, or other laws prohibiting sex discrimination. Notably, the Court focused on the status of the employees and used the term ‘transgender status’ rather than the broader and amorphous term ‘gender identity.’ Restrict the application of Bostock. The new Administration should restrict Bostock’s application of sex discrimination protections to sexual orientation and transgender status in the context of hiring and firing. Withdraw unlawful ‘notices’ and ‘guidances.’ The President should direct agencies to withdraw unlawful ‘notices’ and ‘guidances’ purporting to apply Bostock’s reasoning broadly outside hiring and firing. Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics. The President should direct agencies to rescind regulations interpreting sex discrimination provisions as prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, sex characteristics, etc.” [Project 2025, Chapter 18: Department of Labor, p. 584, [2023](#)]

- **Project 2025 Called On The Next Conservative Administration To Not Allow Bostock’s Holding To Be Extended To The Broader Categories Of “Sexual Orientation” Or “Gender Identity.”** “The new Administration should restrict Bostock’s application of sex discrimination protections to sexual orientation and transgender status in the context of hiring and firing. Withdraw unlawful ‘notices’ and ‘guidances.’ The President should direct agencies to withdraw unlawful ‘notices’ and ‘guidances’ purporting to apply Bostock’s reasoning broadly outside hiring and firing. Rescind regulations prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, and sex characteristics. The President should direct agencies to rescind regulations interpreting sex discrimination provisions as prohibiting discrimination on the basis of sexual orientation, gender identity, transgender status, sex characteristics, etc.” [Project 2025, Chapter 18: Department of Labor, p. 584, [2023](#)]

Berry’s Chapter Called For Limiting The Applicability Of The National Labor Relations Act (NLRA) And The Fair Labor Standards Act (FLSA), Including Granting States Waivers From These Federal Laws.

Project 2025 Called For Congress To Allow States To Have Waivers From The National Labor Relations Act And The Fair Labor Standards Act. “Labor Law. The federal laws governing labor-management relations have barely changed in generations, and reforms on the federal level have been almost impossible to get through Congress. To modernize labor law, the Congress should: Pass legislation allowing waivers for states and local governments. To encourage experimentation and reform efforts at the state and local levels, Congress should pass legislation allowing waivers from federal labor laws like the NLRA and FLSA under certain conditions. State and local governments seeking waivers would be required to demonstrate that their reforms would accomplish the purpose of the underlying law, and not take away any current rights held by workers or employers. In addition, waivers would be limited to a five-year period, after which time they could be modified, canceled, or renewed.” [Project 2025, Chapter 18: Department of Labor, p. 605, [2023](#)]

Project 2025 Called For Making Protections Of The Fair Labor Standards Act And The Occupational Safety And Health Act Subject To Labor Union-Management Negotiation, Including Overtime Protections. “Tailoring National Employment Rules. National employment laws like the Fair Labor Standards Act (FLSA) and the Occupational Safety and Health (OSH) Act set out one-size-fits-all ‘floors’ regulating the employment relationship. These substantive worker protections often do not mesh well with the procedural worker protections offered through the NLRA’s collective bargaining process. Unions could play a powerful role in tailoring national employment rules to the needs of a particular workplace if, in unionized workplaces, national rules were treated as negotiable defaults rather than non-negotiable floors. Congress should amend the NLRA to authorize collective bargaining to treat national employment laws and regulations as negotiable defaults. For example, this reform would allow a union to bless a relaxed overtime trigger (e.g., 45 hours a week, or 80 hours over two weeks) in exchange for firm employer commitments on predictable scheduling.” [Project 2025, Chapter 18: Department of Labor, p. 603, [2023](#)]

Berry’s Chapter Called For The Restoration Of A Trump Rule Limiting DOL’s Ability To Issue Guidance And Called On The Equal Employment Opportunity Commission (EEOC) To Stop Issuing Guidance Altogether.

Project 2025 Called On The Next Conservative President To Restore A Trump Labor Rule Limiting The Use Of Official Guidance Documents. “But guidance is often used to create new rules overnight without following legal requirements—like giving the public an opportunity to provide valuable input. This wrongful use of guidance hurts workers and those who employ them. In October 2019, President Trump signed an executive order ending this abusive practice and created a new, fairer system for American businesses and their employees. In response, DOL published its PRO Good Guidance rule, which expressly limits its use of guidance in enforcement actions and gives the public the opportunity to submit comments to influence the department’s decisions on creating, revising, and even rescinding guidance. Under this rule, agencies cannot treat guidance as legally binding and must make all guidance documents readily accessible on their searchable online databases. This rule was immediately rescinded by the Biden Administration. DOL should reinstitute the PRO Good Guidance rule via notice and comment.” [Project 2025, Chapter 18: Department of Labor, p. 593, [2023](#)]

Project 2025 Called On Congress To “Amend The Administrative Procedure Act To Explicitly Limit The Use Of Guidance Documents.” “Congress should amend the Administrative Procedure Act to explicitly limit the use of guidance documents.” [Project 2025, Chapter 18: Department of Labor, p. 593, [2023](#)]

Project 2025 Called On The EEOC To Stop Issuing “Guidance” Or “Technical Assistance,” Arguing That The EEOC Does Not Have Rulemaking Authority. “General EEOC Reforms. The Equal Employment

Opportunity Commission (EEOC) does not have rulemaking authority under Title VII and other laws it enforces, yet it issues ‘guidance,’ ‘technical assistance,’ and other documents, including some that push new policy positions. EEOC should disclaim its regulatory pretensions and abide by the guidance reforms discussed below. EEOC should disclaim its regulatory pretensions. Affirm decision-making via majority vote of Commissioners. EEOC should affirm as policy the Title VII requirement that it exercise substantive power via majority vote of Commissioners, not by unilateral Chair action or by delegation to staff.” [Project 2025, Chapter 18: Department of Labor, p. 586, [2023](#)]

Berry’s Chapter Called For Repealing Executive Order 11246, Which Gave The DOL Authority To Enforce Nondiscrimination Among Federal Contractors And Could Be Used To Enforce “Novel Anti-Discrimination Theories.”

Project 2025 Called For Eliminating The Office Of Federal Contract Compliance Programs Which Enforces A Requirement That Federal Contractors Commit To Nondiscrimination. “Eliminate OFCCP. The Office of Federal Contract Compliance Programs (OFCCP) exists to enforce Executive Order (EO) 11246. That order was originally signed in 1965 to require federal contractors (and subcontractors) to commit to nondiscrimination. It gave enforcement authority to the Department of Labor, up to and including debarment from federal contracting. The Equal Employment Opportunity Commission has since grown, often making OFCCP’s authority redundant and imposing a second regulatory agency under whose rules businesses must operate. In addition, under EO 11246, the President and DOL can force a huge swath of American employers to comply with rules and regulations based on novel anti-discrimination theories (such as sexual orientation and gender identity theories) that Congress had never imposed by statute.” [Project 2025, Chapter 18: Department of Labor, p. 583-584, [2023](#)]

- **Project 2025 Claimed That Executive Order 11246 Could Be Used To Enforce “Novel Anti-Discrimination Theories (Such As Sexual Orientation And Gender Identity Theories) That Congress Had Never Imposed By Statute.”** “In addition, under EO 11246, the President and DOL can force a huge swath of American employers to comply with rules and regulations based on novel anti-discrimination theories (such as sexual orientation and gender identity theories) that Congress had never imposed by statute.” [Project 2025, Chapter 18: Department of Labor, p. 583-584, [2023](#)]

Project 2025 Called For Rescission Of Executive Order 11246, Which It Said Would Protect Federal Contractors From The “Changing Political Whims Of A President.” “Rescind EO 11246. The President should eliminate OFCCP by simply rescinding EO 11246. Federal contractors would still be bound by statutory nondiscrimination law but would no longer work under overlapping regimes. (Contractors’ residual obligations under Section 503 of the Rehabilitation Act and Vietnam Era Veterans’ Readjustment Assistance Act (VEVRAA) could be enforced by EEOC or DOL.) Contractors also would be less subject to the changing political whims of a President that might impose significant new costs or burdens on the contractors.” [Project 2025, Chapter 18: Department of Labor, p. 584, [2023](#)]

Berry’s Chapter Asserted That The “Left” In The Federal Government Has Favored “Human Resources Bureaucracies, Climate-Change Activists, And Union Bosses—All Against The Interest Of American Workers.”

Project 2025 Claimed That “The Left” Has “Abused” Federal Labor And Employment Agencies “To Favor Human Resources Bureaucracies, Climate-Change Activists, And Union Bosses—All Against The Interest Of American Workers.” “Despite significant progress by the Trump Administration, a massive administrative state now hangs over productive industry and labor organization, acting as a damper on social and economic life. And under the Biden Administration, that administrative state has imposed the most assertive left-wing social-engineering agenda in the agencies’ history and ratcheted up regulatory costs on small businesses and other productive industry. The agencies’ authorities have been abused by the Left to

favor human resources bureaucracies, climate-change activists, and union bosses—all against the interest of American workers.” [Project 2025, Chapter 18: Department of Labor, p. 582, [2023](#)]

Berry’s Chapter Called On The Next Conservative Administration To “Maximize Hiring Of Political Appointees” To “Improve The Political Accountability” Of The DOL.

Project 2025 Called For Maximizing The “Hiring Of Political Appointees” At The Labor Department.

“Maximize hiring of political appointees. At its best, the Trump Administration Department of Labor worked with up to 150 political appointees. That is still a tiny percentage of the department. The number of political appointees should be maximized in order to improve the political accountability of the department.” [Project 2025, Chapter 18: Department of Labor, p. 615, [2023](#)]

Berry’s Chapter Made A Variety Of Proposals That Would Effectively Reduce How Much Overtime Pay Workers Could Receive, Including Restoring A Trump Rule That Would Limit Overtime Pay To Workers Who Make Less Than \$35,000 A Year.

Project 2025 Called On Congress To Pass A Law Allowing Private Sector Employees To Choose Whether They Want To Be Paid Time-And-A-Half For Working More Than 40 Hours Of Work In A Week Or Accrue Time-And-A-Half Paid Time Off.

“Allow workers to accumulate paid time off. Lower- and middle-income workers are more likely be in jobs that are subject to overtime laws that require employers to pay time-and-a-half for working more than 40 hours a week. Congress should enact the Working Families Flexibility Act. The Working Families Flexibility Act would allow employees in the private sector the ability to choose between receiving time-and-a-half pay or accumulating time-and-a-half paid time off (a choice that many public sector workers already have). For example, if an individual worked two hours of overtime every week for a year, he or she could accumulate four weeks of paid time off to use for paid family leave, vacation, or any reason.” [Project 2025, Chapter 18: Department of Labor, p. 587, [2023](#)]

Project 2025 Called On Congress To Limit Overtime Pay For Telework To Work Exceeding 10 Hours In A Single Day. “Congress should clarify that overtime for telework applies only if the employee exceeds 10 hours of work in a specific day (and the total hours for the week exceed 40).” [Project 2025, Chapter 18: Department of Labor, p. 589, [2023](#)]

Project 2025 Called On Congress To Allow Employers To Change The Period, From One Week To Two Or Four Weeks, Over Which Overtime Could Be Calculated. “Congress should provide flexibility to employers and employees to calculate the overtime period over a longer number of weeks. Specifically, employers and employees should be able to set a two- or four-week period over which to calculate overtime. This would give workers greater flexibility to work more hours in one week and fewer hours in the next and would not require the employer to pay them more for that same total number of hours of work during the entire period.” [Project 2025, Chapter 18: Department of Labor, p. 592, [2023](#)]

Project 2025 Called For Restoring A Trump Regulation That Would Limit Which Employees Could Qualify To Receive Overtime Pay. “DOL should maintain an overtime threshold that does not punish businesses in lower-cost regions (e.g., the southeast United States). The Trump-era threshold is high enough to capture most line workers in lower-cost regions. One possibility to consider (likely requiring congressional action) would be to automatically update the thresholds every five years using the Personal Consumption Expenditures (PCE) as an inflation adjustment. This could reduce the likelihood of a future Administration attempting to make significant changes but would also impose more adjustments on businesses as those automatic increases take hold.” [Project 2025, Chapter 18: Department of Labor, p. 592, [2023](#)]

- **The Trump Regulation Limited Workers Entitled To Overtime Pay To Those Who Made Less Than \$679 Per Week, Or \$35,000 Per Year.** “Federal law requires that people working more than 40 hours a week be paid 1.5 times their pay rate for the extra hours, but allows employers to exempt salaried workers who make above a certain threshold and are deemed to have executive, administrative, or professional duties. Basically, the threshold is supposed to help protect workers with little bargaining power—for example, modestly compensated front-line supervisors at fast-food restaurants—from being forced to work unpaid overtime. But the overtime pay threshold has been so eroded by inflation that people earning as little as \$455 per week (the equivalent of \$23,660 per year) can be forced to work 60 or more hours a week for no more pay than if they worked 40 hours. In 2016, the Obama Labor Department issued a rule that would have raised the overtime pay salary threshold to \$47,476. But in November 2016—just before the rule was set to go into effect—a district court judge in Texas blocked the rule nationwide. On March 22, 2019, the Department of Labor published a proposal to set the salary threshold under which almost all workers are entitled to overtime pay to \$679 per week, or \$35,308 for a full-year worker, in 2020. The adoption of this proposal would leave behind millions of workers who would have gotten new or strengthened overtime protections under regulations finalized in 2016.” [Economic Policy Institute, [4/8/19](#)]

Berry’s Chapter Called For Restoring Trump Rules Determining Which Workers Are Independent Contractors, And Not Employees Entitled To Certain Protections.

Project 2025 Called For A Bright-Line Test To Determine Whether Someone Is An Employee Or Independent Contractor And Allow A “Safe Harbor” From Employee Status For Businesses That Allow Independent Workers “Access To Earned Benefits.” “NLRB and DOL should return to their 2019 and 2021 independent contractor rules that provided much-needed clarity for workers and employers. Congress should establish a bright-line test—based on the level of control an individual exercises over his or her work—to determine whether a payee is an employee or an independent contractor, across all relevant laws. This would prevent continued uncertainty as well as provide continuity across federal laws. Congress should provide a safe harbor from employer-employee status for companies that offer independent workers access to earned benefits. Doing so would increase access among independent contractors to traditional pooled workplace benefits such as health care and retirement savings accounts.” [Project 2025, Chapter 18: Department of Labor, p. 591, [2023](#)]

- **Project 2025 Asserted That Providing Employers A “Safe Harbor” From Employee Status Where They Allow Independent Contractors Access To Earned Benefits Would “Increase Access Among Independent Contractors To Traditional Pooled Workplace Benefits Such As Health Care And Retirement Savings Accounts.”** “Congress should provide a safe harbor from employer-employee status for companies that offer independent workers access to earned benefits. Doing so would increase access among independent contractors to traditional pooled workplace benefits such as health care and retirement savings accounts.” [Project 2025, Chapter 18: Department of Labor, p. 591, [2023](#)]

Berry’s Chapter Called For Rolling Back Biden And Obama Administration Efforts To Make Corporate Franchisors Responsible For Franchisee Employees And Called On Congress To Restore Older Definitions Of “Joint Employers.”

Project 2025 Called For Rolling Back Obama And Biden Administration Efforts To Make Corporate Franchisors Responsible For Employees Of A Franchisee, Saying The Efforts Have Raised Prices, Cost Jobs, And Reduced Opportunities For Small-Business Entrepreneurs. “The franchise structure offers a proven business model for individuals who want to own and operate their own small business. An Obama-era regulation changed the definition of a joint employer to make corporate franchisors jointly liable for employees of individual franchisee owners, even without the franchisor exercising any direct control over those employees. The Biden Administration is advancing an even more expansive definition of a joint employer that would upend the franchise business model, taking away ownership and income opportunities from

small-business entrepreneurs, costing jobs, and raising prices.” [Project 2025, Chapter 18: Department of Labor, p. 591, [2023](#)]

Project 2025 Called On Congress To Codify The Existing Understanding Of “Joint Employers” Prior To Obama And Biden Efforts To Expand The Definition. “DOL and NLRB should return to the long-standing approach to defining joint employers based on direct and immediate control. Congress should enact the Save Local Business Act, which would codify the long-standing definition that has existed outside the Obama-era and Biden-proposed rules.” [Project 2025, Chapter 18: Department of Labor, p. 591, [2023](#)]

Berry’s Chapter Called For More Restrictions On And Investigations Of Unions, Fewer Restrictions On Management, Including Bosses’ Retaliation Against Organizing Efforts, And Enforcement Against Unions That Use Resources On “Left-Wing Culture War Issues.”

Project 2025 Called For Banning “Card Check” Union Recognition, Which It Said Is Undemocratic. “Unionizing the Workplace: Card Check vs. Secret Ballot. Under the NLRA, instead of having a secret ballot election about the decision to unionize a workplace, a union may instead collect signed pro-union cards from a majority of the employees it wishes to represent and then ask the employer and National Labor Relations Board for voluntary union recognition. That request gives the employer the option to hold a secret-ballot election or to recognize the union without any such election. This ‘card check’ procedure is likely to induce employees to provide their signed cards in ways that do not accurately reflect their true preferences—ranging from a desire not to offend the signature requestor to a wish to avoid intimidation and coercion to signing based on false information provided by union organizers. In short, the card check procedure sidesteps many aspects of democratic decision-making that free and fair elections conducted by secret ballot are supposed to accomplish. Notably, the general counsel of the National Labor Relations Board has recently proposed an esoteric legal theory that card-check decision-making is required under the law, basing this theory on an old NLRB case, Joy Silk, even though the Supreme Court has repeatedly rejected mandatory card-check recognition. Discard ‘card check.’ Congress should discard ‘card check’ as the basis of union recognition and mandate the secret ballot exclusively.” [Project 2025, Chapter 18: Department of Labor, p. 602-603, [2023](#)]

Project 2025 Called For Making It Easier For Employees To Decertify A Labor Union At A Workplace. “Contract Bar Rule. Although current labor law allows a union to establish itself at a workplace at more or less any time, the calendar for any attempt to decertify a union is considerably more constrained. If a union is recognized as a collective bargaining agent, then employees may not decertify it or substitute another union for it for at least one year under federal law (the ‘certification bar’). Similarly, when a union reaches a collective bargaining agreement with an employer, it is immune from a decertification election for up to three years (the ‘contract bar’). A typical consequence of these rules is that employees must often wait four years before they are allowed a chance at decertification. Employees then have only a 45-day window to file a decertification petition; if the employer and union sign a successor contract, then the contract bar comes into play once again—meaning employees with an interest in decertification must wait another three years. Eliminate the contract bar rule. NLRB should eliminate the contract bar rule so that employees with an interest in decertification have a reasonable chance to achieve their goal.” [Project 2025, Chapter 18: Department of Labor, p. 603, [2023](#)]

Project 2025 Called For Greater Reporting Requirements For Public Sector Labor Unions. “Private-sector unions must file detailed financial information with DOL—on matters including union spending, income, loans, assets, membership information, and employee salary—but unions composed entirely of state or local employees are exempt from this filing requirement. These disclosure requirements help workers and the public understand how union leaders are raising and spending union dues; they also can serve as a vital source of information that helps workers decide if the unions they are asked to join are good stewards of the funds they collect. DOL, under both George W. Bush and Donald Trump, tried rulemakings (known as the Intermediate Bodies Rule) that would require some government unions to file the same information that is required of private-sector unions. Under President Trump, OLMS required unions to disclose involvement in

trusts that they either own a majority stake in or control. In the past, union trust spending has been hidden, and it appears that trust assets have occasionally been corruptly spent for the benefit of private interests in union leadership—such as \$30,000 spent on a private party, \$37,500 spent on a Montblanc pen, condominiums for those in power, golf outings, and a Ferrari. But the Biden DOL eliminated a transparency rule requiring the filing of the T-1 Trust Annual Report.” [Project 2025, Chapter 18: Department of Labor, p. 599-600, [2023](#)]

Project 2025 Called For Rolling Back NLRB Interpretations Of “Protected Concerted Activities” For Which Employers Cannot Retaliate Against Workers Who Desire To Form A Union. “Interpreting ‘Protected Concerted Activity.’ In an effort to prevent employers from retaliating against workers who express a desire to unionize, certain activities are deemed ‘protected concerted activity’ (under §7 of the NLRA). The NLRB has issued extreme interpretations of these activities, such as determining that a business’s requiring its employees to be courteous to customers and one another is an unlawful infringement on the free speech rights implicit in the protected concerted activity protections in the NLRA. Reverse unreasonable interpretations of ‘protected concerted activity.’ The NLRB should return to the 2019 Alstate Maintenance interpretation of what does and does not constitute protected concerted activity, including listing eight instances of lawful actions by employers.” [Project 2025, Chapter 18: Department of Labor, p. 600, [2023](#)]

Project 2025 Called For Rescinding The “Persuader Rule” Which Would Require Disclosure About Lawyers Or Consultants Hired To Advise Corporations On Union Activity. “Persuader Rule. During the Obama Administration, DOL created significant regulatory burdens for employers with respect to the advice that employers receive about union activity. As a general matter, employers who hire lawyers or other consultants to advise employees about union issues must file disclosure forms with the department, as must the lawyers and consultants themselves. Prior to the Obama Administration, advice provided solely to the employer required no disclosure. The Obama Administration attempted to eliminate this ‘advice exemption’ with a directive known as the ‘persuader rule,’ which was successfully challenged in court. In 2018, the Trump Administration formally rescinded the persuader rule. DOL should rescind the persuader rule once again should the Biden Administration revive it.” [Project 2025, Chapter 18: Department of Labor, p. 602, [2023](#)]

Project 2025 Called On The NLRB To Take Enforcement Actions Against Labor Unions That Use “Their Members’ Resources On Left-Wing Culture War Issues That Are Unrelated, And In Fact Often Harmful, To Union Members’ Own Interests.” “Duty of Fair Representation. Unions have a duty of fair representation to their members, yet they too often abuse that duty to use their members’ resources on left-wing culture-war issues that are unrelated, and in fact often harmful, to union members’ own interests. The NLRB should take enforcement or amicus action advancing the position that political conflicts of interest by union leadership can support claims for breach of the duty of fair representation in a manner analogous to financial conflicts of interest and analogous to breaches of the fiduciary duty of loyalty in other areas of law.” [Project 2025, Chapter 18: Department of Labor, p. 600, [2023](#)]

Project 2025 Called For Expanding The Jurisdiction Of The Office Of Labor-Management Standards To Allow For More Investigations Of Labor Unions. “Office of Labor-Management Standards Initiative. Currently, the Office of Labor-Management Standards (OLMS) may investigate potential employer malfeasance with regard to union funds in the absence of any complaint by a worker or union but may not do the same with regard to potential union malfeasance. If OLMS has evidence that a union may be violating the law based on information available to the agency (such as annual financial disclosure reports, information developed during an audit of a union’s books and records, or information obtained from other government agencies) it should be permitted to open an investigation. It should have the same enforcement tools available for both employers and unions. Revise investigation standards. The Office of Labor-Management Standards should revise its investigation standards to authorize investigations without receiving a formal complaint.” [Project 2025, Chapter 18: Department of Labor, p. 602, [2023](#)]

Berry’s Chapter Called For Eliminating The “DEI Agenda, Promoting Pro-Life Policies That Support Family Life” To “Secure A Future In Which The American Worker, And By Extension The American Family, Can Thrive And Prosper.”

Project 2025 Called For Eliminating The “DEI Agenda, Promoting Pro-Life Polices That Support Family Life” To “Secure A Future In Which The American Worker, And By Extension The American Family, Can Thrive And Prosper.” “By eliminating the policies promoted by the DEI agenda, promoting pro-life policies that support family life, expanding available apprenticeship programs including by encouraging the role of religious organizations in apprenticeships, making family-sustaining jobs accessible, simplifying employment requirements, and allowing employers to prefer American citizens when making hiring decisions, among the other policy recommendations discussed above, we can begin to secure a future in which the American worker, and by extension the American family, can thrive and prosper.” [Project 2025, Chapter 18: Department of Labor, p. 616, [2023](#)]

Berry’s Project 2025 Chapter, Citing “Judeo-Christian Tradition.” Claimed Work Is “Service To God, Neighbor And Family.”

Project 2025 Called The “Family-Supporting Job [...] The Centerpiece Of The American Economy,” Citing “Judeo-Christian Tradition, Stretching Back To Genesis” For The Proposition That Work Is “Integral To Human Dignity, As Service To God, Neighbor And Family.” “The role that labor policy plays in that promise is twofold: Give workers the support they need for rewarding, well-paying, and self-driven careers, and restore the family-supporting job as the centerpiece of the American economy. The Judeo-Christian tradition, stretching back to Genesis, has always recognized fruitful work as integral to human dignity, as service to God, neighbor, and family. And Americans have long been known for their work ethic.” [Project 2025, Chapter 18: Department of Labor, p. 581, [2023](#)]

Berry’s Chapter Promotes “Pro-Life Workplace Accommodations For Mothers” Because “Federal Law Should Protect Life And Promote Pro-Family Policies,” And Backs States’ Ability To Preempt Federal Law In Order To Restrict Employers From Offering Abortion Benefits.

Project 2025 Called For Promotion Of “Pro-Life Workplace Accommodations For Mothers” Because “Federal Law Should Protect Life And Promote Pro-Family Policies.” “Promote pro-life workplace accommodations for mothers. Federal law should protect life and promote pro-family policies.” [Project 2025, Chapter 18: Department of Labor, p. 585, [2023](#)]

Project 2025 Noted That No Federal Laws Required An Employer To “Provide Health Insurance Benefits For Elective Abortion.” “Current law, the Pregnancy Discrimination Act, provides nondiscrimination protections in the workplace for pregnancy, childbirth, or related medical conditions. The Pregnant Workers Fairness Act (PWFA) requires employers to make reasonable accommodations for women ‘to the known limitations related to the pregnancy, childbirth, or related medical conditions,’ unless ‘the accommodation would impose an undue hardship on the operation of the [employer’s] business.’ The Americans with Disabilities Act (ADA) also provides nondiscrimination and accommodation protections in the workplace for certain pregnancy-related disability. None of these laws requires an employer provide health insurance benefits for elective abortion.” [Project 2025, Chapter 18: Department of Labor, p. 585, [2023](#)]

Project 2025 Called For New Legislation That Would Require “Equal (Or Greater) Benefits” For Mothers Where An Employer Provided Benefits For Abortion And Clarify That “No Employer Is Required To Provide Any Accommodations Or Benefits For Abortion.” “Pass a law requiring equal (or greater) benefits for pro-life support for mothers and clarifying abortion exclusions. Congress should pass a law requiring that to the extent an employer provides employee benefits for abortion, it must provide equal or greater benefits for pregnancy, childbirth, maternity, and adoption. That law should also clarify that no employer is required to provide any accommodations or benefits for abortion.” [Project 2025, Chapter 18: Department of Labor, p. 585, [2023](#)]

Project 2025 Argued For Congress And DOL To Support States' Rights To Restrict Employers From Offering Abortion Benefits Under Employee-Sponsored Benefit Plans. “Keep anti-life ‘benefits’ out of benefit plans. Some benefits attorneys and pro-choice advocates have argued since the Supreme Court’s *Dobbs v. Jackson Women’s Health Organization* decision that the longstanding doctrine of Employee Retirement Income Security Act of 1974 (ERISA) preemption should block individual states’ efforts to prohibit employers from helping employees procure abortions via offering various kinds of coverage under employee-sponsored benefit plans. ERISA should not be allowed to trump states’ ability to protect innocent human life in the womb. Congress and DOL should clarify that ERISA does not preempt states’ power to restrict abortion, surrogacy, or other anti-life ‘benefits.’” [Project 2025, Chapter 18: Department of Labor, p. 585, [2023](#)]

Project 2025 Called On The Equal Employment Opportunity Commission (EEOC) To “Disclaim Power To Enter Into Consent Decrees” And Prioritize Its Enforcement Toward “Claims Of Failure To Accommodate Disability, Religion, And Pregnancy (But Not Abortion).” “Disclaim power to enter into consent decrees. EEOC should disclaim power to enter into consent decrees that require employer actions that it could not require under the laws it enforces. Reorient enforcement priorities. EEOC should reorient its enforcement priorities toward claims of failure to accommodate disability, religion, and pregnancy (but not abortion).” [Project 2025, Chapter 18: Department of Labor, p. 587, [2023](#)]

Berry’s Chapter Called For “Robust” Protections And Accommodations For Religious Employers And Employees From Federal Labor Laws, Including Non-Discrimination Laws, And Requiring Most Employers To Pay Overtime For Work During The Sabbath.

Project 2025 Called On The Next Conservative Administration To “Provide Robust Protections For Religious Employers” Claiming That The Biden Administration Has Been “Hostile To People Of Faith, Especially Those With Traditional Beliefs About Marriage, Gender, And Sexuality.” “Provide robust protections for religious employers. America’s religious diversity means that workplaces include people of many faiths and that many employers are faith-based. Nevertheless, the Biden Administration has been hostile to people of faith, especially those with traditional beliefs about marriage, gender, and sexuality. The new Administration should enact policies with robust respect for religious exercise in the workplace, including under the First Amendment, the Religious Freedom Restoration Act of 1993 (RFRA), Title VII, and federal conscience protection laws.” [Project 2025, Chapter 18: Department of Labor, p. 585-586, [2023](#)]

Project 2025 Called On The Next Conservative Administration To “Provide Robust Accommodations For Religious Employees.” “Provide Robust Accommodations for Religious Employees. Title VII requires reasonable accommodations for an employee’s sincerely held religious beliefs, observances, or practices unless it poses an undue hardship on the employer’s business. These accommodation protections also apply to issues related to marriage, gender, and sexuality.” [Project 2025, Chapter 18: Department of Labor, p. 586, [2023](#)]

Project 2025 Called On The Next Conservative President To Issue An Executive Order Clarifying That “Religious Employers Are Free To Run Their Businesses According To Their Religious Beliefs, General Nondiscrimination Laws Notwithstanding.” “Issue an executive order protecting religious employers and employees. The President should make clear via executive order that religious employers are free to run their businesses according to their religious beliefs, general nondiscrimination laws notwithstanding, and support participation of religious employees and employers as federal contractors and in federal activities and programs.” [Project 2025, Chapter 18: Department of Labor, p. 586, [2023](#)]

Project 2025 Called On Congress To Make Explicit That Religious Employers “May Make Employment Decisions Based On Religion Regardless Of Nondiscrimination Laws.” “Clarify Title VII’s religious organization exemptions. Congress should clarify Title VII’s religious organization exemptions to make it more

explicit that those employers may make employment decisions based on religion regardless of nondiscrimination laws.” [Project 2025, Chapter 18: Department of Labor, p. 586, [2023](#)]

Project 2025 Called On Congress To Support The “Sabbath As A Day Of Rest” By Requiring That Workers Be Paid Time-And-A-Half For Work On The Sabbath. “Sabbath Rest. God ordained the Sabbath as a day of rest, and until very recently the Judeo-Christian tradition sought to honor that mandate by moral and legal regulation of work on that day. Moreover, a shared day off makes it possible for families and communities to enjoy time off together, rather than as atomized individuals, and provides a healthier cadence of life for everyone. Unfortunately, that communal day of rest has eroded under the pressures of consumerism and secularism, especially for low-income workers. Congress should encourage communal rest by amending the Fair Labor Standards Act (FLSA) to require that workers be paid time and a half for hours worked on the Sabbath. That day would default to Sunday, except for employers with a sincere religious observance of a Sabbath at a different time (e.g., Friday sundown to Saturday sundown); the obligation would transfer to that period instead. Houses of worship (to the limited extent they may have FLSA-covered employees) and employers legally required to operate around the clock (such as hospitals and first responders) would be exempt, as would workers otherwise exempt from overtime.” [Project 2025, Chapter 18: Department of Labor, p. 589, [2023](#)]

- **Project 2025 Said That The Sabbath Should Default To Sunday But Could Accommodate Employers With Other Sincere Religious Observance Of Sabbath, Such As Friday Sundown To Saturday Sundown.** Congress should encourage communal rest by amending the Fair Labor Standards Act (FLSA) to require that workers be paid time and a half for hours worked on the Sabbath. That day would default to Sunday, except for employers with a sincere religious observance of a Sabbath at a different time (e.g., Friday sundown to Saturday sundown); the obligation would transfer to that period instead.”[Project 2025, Chapter 18: Department of Labor, p. 589, [2023](#)]
- **Project 2025’s Sabbath Rest Proposal Would Exempt Houses Of Worship And Employers “Legally Required To Operate Around The Clock (Such As Hospitals And First Responders.”** [Project 2025, Chapter 18: Department of Labor, p. 589, [2023](#)]

Berry’s Chapter Called The “DEI Revolution In Labor Policy” A Vehicle To “Discriminate Against Conservative And Religious Viewpoints [...] Including Pro-Life Views.”

Project 2025 Called For Reversing The “DEI Revolution In Labor Policy” Which It Claimed Has Become A “Vehicle With Which To Advance Race, Sex, And Other Classifications To Discriminate Against Conservative And Religious Viewpoints [...] including Pro-Life Views.” “Reverse the DEI Revolution in Labor Policy. Under the Obama and Biden Administrations, labor policy was yet another target of the Diversity, Equity, and Inclusion (DEI) revolution. Under this managerialist left-wing race and gender ideology, every aspect of labor policy became a vehicle with which to advance race, sex, and other classifications and discriminate against conservative and religious viewpoints on these subjects and others, including pro-life views. The next Administration should eliminate every one of these wrongful and burdensome ideological projects.” [Project 2025, Chapter 18: Department of Labor, p. 582, [2023](#)]

Berry’s Chapter Asserted That The Biden Administration Used Racial Classifications And Preferences “Under The Guise Of DEI And Critical Race Theory.”

Project 2025 Accused The Biden Administration Of Pushing Racial Equity “In Every Area Of Our National Life,” Condoning The **“Use Of Racial Classifications And Racial Preferences Under The Guise Of DEI And Critical Race Theory.”** “Eliminate Racial Classifications and Critical Race Theory Trainings. The Biden Administration has pushed ‘racial equity’ in every area of our national life, including in employment, and

has condoned the use of racial classifications and racial preferences under the guise of DEI and critical race theory, which categorizes individuals as oppressors and victims based on race. Nondiscrimination and equality are the law; DEI is not. Title VII flatly prohibits discrimination in employment on the basis of race, color, and national origin.” [Project 2025, Chapter 18: Department of Labor, p. 582, [2023](#)]

- **Project 2025 Declared, “Nondiscrimination And Equality Are The Law; DEI Is Not.”** “Nondiscrimination and equality are the law; DEI is not. Title VII flatly prohibits discrimination in employment on the basis of race, color, and national origin.” [Project 2025, Chapter 18: Department of Labor, p. 582, [2023](#)]

Berry’s Chapter Proposed Banning Funding For “All Critical Race Theory Training” And “Racial Classification And Quotas [...] And DEI Trainings That Promote Critical Race Theory.”

Project 2025 Called For A Ban On Funding For “All Critical Race Theory Training.” “Issue an executive order banning, and Congress should pass a law prohibiting the federal government from using taxpayer dollars to fund, all critical race theory training (CRT).” [Project 2025, Chapter 18: Department of Labor, p. 582, [2023](#)]

Project 2025 Called For A Ban On The Use Of “Racial Classification And Quotas, Including Human-Resources Classifications And DEI Trainings That Promote Critical Race Theory.” “Direct DOJ and EEOC to enforce Title VII. The President should direct the Department of Justice and Equal Employment Opportunity Commission to enforce Title VII to prohibit racial classifications and quotas, including human-resources classifications and DEI trainings that promote critical race theory.” [Project 2025, Chapter 18: Department of Labor, p. 582-583, [2023](#)]

Project 2025 Called For A Ban On The EEOC Collecting Race And Ethnicity Employment Statistics, Which Is Said Could “Lead To Racial Quotas To Remedy Alleged Race Discrimination” Under A “Disparate Impact Theory.” “Eliminate EEO-1 data collection. The Equal Employment Opportunity Commission collects EEO-1 data on employment statistics based on race/ ethnicity, which data can then be used to support a charge of discrimination under a disparate impact theory. This could lead to racial quotas to remedy alleged race discrimination. (The Office of Federal Contract Compliance Programs (OFCCP) also has a right to the data EEOC collects.) Crudely categorizing employees by race or ethnicity fails to recognize the diversity of the American workforce and forces individuals into categories that do not fully reflect their racial and ethnic heritage. Amend Title VII. The next Administration should work with Congress to amend Title VII to prohibit the Equal Employment Opportunity Commission from collecting EEO-1 data and any other racial classifications in employment for both private and public workplaces.” [Project 2025, Chapter 18: Department of Labor, p. 583, [2023](#)]

- **Project 2025 Called For Eliminating “Disparate Impact As A Valid Theory Of Discrimination For Race And Other Bases.”** “Eliminate disparate impact liability. With interracial marriages in America increasing, many Americans do not fit neatly into crude racial categories.¹ Under disparate impact theory, moreover, discriminatory motive or intent is irrelevant; the outcome is what matters. But all workplaces have disparities. Congress should: Eliminate disparate impact as a valid theory of discrimination for race and other bases under Title VII and other laws. Disparities do not (and should not legally) imply discrimination per se. The President should: Sign an executive order explicitly forbidding OFCCP from using disparate impact in its analysis.” [Project 2025, Chapter 18: Department of Labor, p. 583, [2023](#)]

Diana Furchtgott-Roth, Author Of Project 2025's Transportation Dept. Chapter, Advised Trump DOT Secretary Elaine Chao And Is Currently President Of An Advisory Services Firm That Frequently Pushes Anti-Green Energy Positions On Behalf Of "A Select Group Of Clients."

Diana Furchtgott-Roth, The Author Of Project 2025's Chapter On The Department Of Transportation (DOT), Is The Director Of The Heritage Foundation's Center for Energy, Climate, and Environment And Directly Advised Trump DOT Secretary Elaine Chao While A Deputy Assistant Secretary.

Diana Furchtgott-Roth, The Author Of Project 2025's Chapter On The Department Of Transportation, Is The Director Of The Heritage Foundation's Center for Energy, Climate, and Environment And A Former Senior Official In The Trump Departments Of Transportation And Treasury. "Diana Furchtgott-Roth, an Oxford-educated economist, directs the Center for Energy, Climate, and Environment at The Heritage Foundation and is adjunct professor of economics at George Washington University. Diana served as Deputy Assistant Secretary for Research and Technology at the U.S. Department of Transportation, where she directed the Department's \$1.2 billion research budget; the Office of Positioning, Navigation and Timing and Spectrum Management; and the University Transportation Center program. Diana worked in senior roles in the White House under Presidents Ronald Reagan, George H.W. Bush, and George W. Bush, where she was Chief of Staff of the Council of Economic Advisers." [Project 2025, accessed [05/09/24](#)]

**DEPARTMENT OF
TRANSPORTATION**
Diana Furchtgott-Roth

[Project 2025, accessed [05/09/24](#)]



[DianaFR.com, accessed [05/09/24](#)]



Deputy Assistant Secretary for Research and Technology

U.S. Department of Transportation · Full-time
Feb 2019 - Jan 2021 · 2 yrs
District of Columbia, United States

I led a staff of 1,200 and the Department's \$1.2 billion research portfolio, including grants to over 100 University Transportation Centers. I managed the Office of Positioning, Navigation, Timing, and Spectrum management to ensure resilience of GPS and promote use of spectrum for connected vehicle technologies and intelligent transportation systems. I directed the Bureau of Transportation Statistics; the Volpe National Transportation Systems Center (Cambridge, MA); and the Transportation Safety Institute (Oklahoma City, OK;



Swearing-In Ceremony with Secretary Elaine L. Chao



Acting Assistant Secretary for Economic Policy

U.S. Department of the Treasury · Full-time
2018 - 2019 · 1 yr
District of Columbia, United States

I assessed effects of policies and produced regular reports on state of economy. I represented the Treasury Department at interagency and OECD meetings to forecast economic growth, and I chaired the Long-Term Care Interagency Task Force.



Secretary Steven Mnuchin and Diana

[Linkedin profile for Diana Furchtgott-Roth, accessed [05/09/24](#)]

While The Trump Transportation Department's Deputy Assistant Secretary for Research and Technology, Furchtgott-Roth "Advised Secretary Elaine Chao On Economic Matters, Led A Staff Of 1,200, And Supervised The Department's \$1.2 Billion Annual Research Portfolio." "She served as Deputy Assistant Secretary for Research and Technology at the U.S. Department of Transportation where she advised Secretary Elaine Chao on economic matters, led a staff of 1,200, and supervised the Department's \$1.2 billion annual research portfolio." [DianaFR.com, accessed [05/09/24](#)]

Furchtgott-Roth Is President Of Furchtgott International, An Advisory Services Firm That Serves "A Select Group Of Clients" And Frequently Appears In Conservative Media Outlets To Push Anti-Green Energy Positions.

Furchtgott-Roth Is The President Of Furchtgott International, An Advisory Services Firm For "Economic And Governmental Matters" That Serves "A Select Group Of Clients":



President

Furchtgott International · Full-time
Jan 2021 - Present · 3 yrs 5 mos
Washington, District of Columbia, United States

[Linkedin profile for Diana Furchtgott-Roth, accessed [05/09/24](#)]

Furchtgott International

Advisory services on economic and governmental matters.

[Furchtgott International, accessed [05/09/24](#)]

- **Furchtgott International “Provides A Select Group Of Clients Advisory Services On Economic And Governmental Matters.”** “Diana is also president of Furchtgott International, a firm that provides a select group of clients advisory services on economic and governmental matters.” [DianaFR.com, accessed [05/09/24](#)]

Business Name:

FURCHTGOTT INTERNATIONAL LLC

[...]

Status: ACTIVE

Good Standing: THIS BUSINESS IS **NOT IN GOOD STANDING**

[What does it mean if a business entity is not in good standing or forfeited?](#)

[Maryland Department of Assessments & Taxation, accessed [05/09/24](#)]

As Of May 2024, Furchtgott International Features At Least A Dozen Publications And Media Appearances In 2024 Alone—All Touting Conservative, Anti-Environmental, And Pro-Industry Positions On Transportation Policy:

Recent Publications & Media Appearances

["Biden's Ill-Advised Alaska Oil Ban Bodes Continued Pain at Pump,"](#) *The Daily Signal*, April 19, 2024.

["UAW would be loser for Volkswagen employees,"](#) *The Washington Times*, April 16, 2024.

["The Five C's Behind the Forced EV Transition Failure,"](#) *Newsmax*, March 31, 2024.

["Electric Vehicle Enthusiasm Loses Power,"](#) *Forbes.com*, February 29, 2024.

["Biden is to Blame for the Economic Problems he Complains About,"](#) *FOX News*, February 14, 2024.

["America should ban Chinese EVs,"](#) *FOX News*, February 15, 2024.

["American Innovation Can Counter Russia's New Threat,"](#) *Forbes.com*, February 15, 2024.

["Cheap Chinese EVs pose a 'security risk' to Americans: 'Keep them out,' economist warns,"](#) *FOX Business*, February 9, 2024.

["Ford Pulling Back on EV Push,"](#) *FOX Business*, February 8, 2024.

["A Second Trump Term Would Be Good News for the Environment | Opinion,"](#) *Newsweek*, January 31, 2024.

["This Election Year, Your Energy and Appliance Prices Are on the Ballot,"](#) *National Review*, January 14, 2024.

["FAA Should Focus on Safety, Not Green Energy,"](#) *FOX News*, January 14, 2024.

[Furchtgott International, accessed [05/09/24](#)]

Diana Furchtgott-Roth's Project 2025 Chapter Claimed DOT Had Exceeded Its Authority, Called On A Larger Role For The Private Sector In Transportation Policy, Restoring Trump-Era Rule Limitations On Regulation, Gutting Fuel Economy Standards, Cutting Public Transit Funding, Breaking Up The Federal Aviation Administration (FAA), And Repealing A "Foundational" Maritime Shipping Law.

Diana Furchtgott-Roth's Project 2025 Chapter Claimed That DOT Had Taken On A Role Better Suited To "States, Municipalities, And The Private Sector" And Called On Private-Sector Financing To Keep "Transportation Decisions Out Of The Hands Of Bureaucrats In Washington, D.C."

Project 2025 Wrote That The Department Of Transportation (DOT) Had Strayed From Its Mission Into A Role That Is Better Left To "States, Municipalities, And The Private Sector." "The U.S. Department of Transportation (DOT), with a requested fiscal year (FY) 2023 budget of \$142 billion, was originally intended simply to provide a policy framework for transportation safety, rulemaking, and regulation. However, it has evolved to believe that its role is 'to deliver the world's leading transportation system'—that is, to select individual projects and allocate taxpayer funds in the actual planning, developing, and building of transportation assets. Such a role is held more appropriately by transportation asset owners: primarily states, municipalities, and the private sector." [Project 2025, Chapter 19: Department of Transportation, p. 619, [2023](#)]

Project 2025 Called For “Increasing Private-Sector Financing” To Help Keep “Transportation Decisions Out Of The Hands Of Bureaucrats In Washington, D.C.” “Increasing private-sector financing could revolutionize travel and increase everyday mobility to its greatest potential in a way that Americans prefer. Doing so would keep transportation decisions out of the hands of bureaucrats in Washington, D.C., who are far removed from local problems and preferences.” [Project 2025, Chapter 19: Department of Transportation, p. 621, [2023](#)]

Furchtgott-Roth’s Chapter Called For Restoring Trump Administration Regulatory Policy Limiting Rules And Guidance.

Project 2025 Called For Restoring Trump Administration Regulatory Policy Limiting Rules And Guidance “Without Delay.” “DOT would also reduce unnecessary burdens by returning to the Trump Administration’s ‘rule on rules’ approach to regulations, implemented in late 2019 as RIN 2105-AE84.4 This rule strengthened the Administration’s effort to remove outdated regulations, find cost-saving reforms, and clarify that guidance documents are in fact guidance rather than mandatory impositions. The Biden Administration unwisely moved away from this reform, and the next Administration should revive it without delay.” [Project 2025, Chapter 19: Department of Transportation, p. 622, [2023](#)]

Furchtgott-Roth’s Chapter Called On The Next Conservative Administration To “Reduce Proposed Fuel Economy Levels,” Claiming That Increased Fuel Economy Standards Raise Car Prices, Resulting In Fewer People Buying New Cars, Fewer Manufacturing Jobs, And More Traffic Fatalities.

Project 2025 Called On The Next Conservative Administration To “Reduce Proposed Fuel Economy Levels.” “Reduce proposed fuel economy levels. The Administration should consider returning to the minimum average fuel economy levels specified by Congress for model year 2020 vehicles: levels aimed at achieving a fleet-wide average of 35 miles per gallon. Consideration should be given to maintaining the standards at those levels for the near term in order to promote the objectives laid out by Congress.” [Project 2025, Chapter 19: Department of Transportation, p. 628, [2023](#)]

Project 2025 Blamed Fuel Economy Standards For The “High Numbers Of Injuries On American Roadways,” Claiming That They Raise Car Prices And Prevent People From Buying Newer, Safer Cars. “One reason for the high numbers of injuries on American roadways is that national fuel economy standards raise the price of cars, disincentivizing people from purchasing newer, safer vehicles.” [Project 2025, Chapter 19: Department of Transportation, p. 626, [2023](#)]

Project 2025 Claimed That Meeting The Biden Fuel Economy Standards Will Make Cars More Expensive To Make, Leading To Fewer Affordable Options For Americans, And A Loss Of Jobs In The Auto Industry, As Well As A “A Significant Increase In Traffic Deaths And Injuries.” “As a result of these regulatory actions, automobiles will be significantly more expensive to produce, there will be fewer affordable new vehicle options for American families, and fewer new vehicles will be sold in the U.S. That will do more than translate into a loss of auto industry jobs for American workers: It will also mean a significant increase in traffic deaths and injuries. As fewer new cars are purchased, the price of used cars will rise, and more Americans will be left driving older cars, which traffic statistics show are much less safe than newer vehicles.” [Project 2025, Chapter 19: Department of Transportation, p. 627, [2023](#)]

Furchtgott-Roth’s Chapter Claimed The Biden Administration’s Improved Fuel Economy Standards Would “Have No Meaningful Effect On Global Temperature Trends Over The Long Term.”

Project 2025 Claimed That The Biden Fuel Economy Standard Are “Predicted To Have No Meaningful Effect On Global Temperature Trends Over The Long Term.” “In exchange for all of these harmful effects—on traffic safety, consumer choice, American jobs, the nation’s air quality, and U.S. national security—the Biden fuel economy regulations are predicted to have no meaningful effect on global temperature trends over the long term.” [Project 2025, Chapter 19: Department of Transportation, p. 628, [2023](#)]

Furchtgott-Roth’s Chapter Called For Limiting The EPA’s Role In Setting Fuel Economy Standards And Revoking A Waiver That Allows California To Set Stronger Fuel Economy Standards Within Its Borders.

Project 2025 Claimed That The Biden EPA Improperly Has Assumed Preeminence In Fuel Economy Decisions. “Moreover, and contrary to Congress’s design, the Biden EPA has been given preeminence in the regulation of fuel economy through the setting of carbon dioxide emissions limits for new motor vehicles under the Clean Air Act. Because carbon dioxide emissions levels correspond to mileage in automobiles powered by fossil fuels, these EPA rules are de facto fuel economy requirements that apply independently of NHTSA’s standards.” [Project 2025, Chapter 19: Department of Transportation, p. 627, [2023](#)]

Project 2025 Called For Limiting The EPA’s Role In Setting Fuel Economy Standards. “Ensure that DOT again exercises priority in the setting of fuel economy standards. Any EPA limits on carbon dioxide emissions, even if authorized under the Clean Air Act, must support and work in harmony with DOT standards and must not override them or usurp DOT’s regulatory role under EPCA. For example, EPA could regulate air conditioning systems and leave engine standards to DOT.” [Project 2025, Chapter 19: Department of Transportation, p. 628, [2023](#)]

Project 2025 Claimed That California’s Air Resources Board Is Effectively Setting Fuel Economy Standards For The Whole Nation Due To A Waiver Given To The State Under The Clean Air Act. “The Biden Administration has also granted California a special waiver under the Clean Air Act that permits the California Air Resources Board (CARB) to issue its own fuel economy directives, notwithstanding EPCA’s prohibition on state standards. Under this waiver, CARB has ordered automakers to phase out the sale of ICE-powered automobiles in California and transition to the production of zero-emission vehicles by 2035. The Clean Air Act allows other states to follow California’s requirements; thus, CARB is effectively determining fuel economy policies for the entire nation.” [Project 2025, Chapter 19: Department of Transportation, p. 627, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Revoke California’s Waiver Under The Clean Air Act And “Take All Steps Necessary To Invalidate Any Inconsistent Fuel Economy Requirements Imposed By CARB, Including Its Ban On Sales Of Internal Combustion Engines.” “Revoke the special waiver granted to California by the Biden Administration. California has no valid basis under the Clean Air Act to claim an extraordinary or unique air quality impact from carbon dioxide emissions, and EPCA is clear that under no circumstances may a state agency regulate fuel economy in place of DOT. The federal government should therefore exercise its preemptive authority over CARB and take all steps necessary to invalidate any inconsistent fuel economy requirements imposed by CARB, including its ban on sales of internal combustion engines.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Furchtgott-Roth’s Chapter Complained That The Biden Administration Expanded The Remit Of The Federal Highway Administration (FHWA) To Emphasize Progressive Priorities Like “Equity.”

Project 2025 Called For Narrowing The Scope Of The Federal Highway Administration. “The Federal Highway Administration (FHWA) has jurisdiction over the interstate highway system, which is vital for the transportation of goods and people throughout the country. The FHWA, in conjunction with state DOTs, works to ensure the quality and safety of highways and bridges. However, over the course of decades, presidential Administrations and Congress have caused the FHWA to go beyond its original mission. The variety of

infrastructure projects now eligible for funding through the FHWA include ferryboat terminals, hiking trails, bicycle lanes, and local sidewalks. In many cases, such projects should be the sole responsibility of local or state governments, not dependent on FHWA funding. For local projects, federal involvement adds red tape and bureaucratic delays rather than value.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Project 2025 Claimed That The “Biden Administration Has Broadened The FHWA’s Scope By Emphasizing The Priorities Of Progressive Activists Instead Of Pursuing Practical Goals,” Complaining About A Focus On “‘Equity,’ A Nebulous Concept That In Practice Means Awarding Grants To Favored Identity Groups.” “The Biden Administration has broadened the FHWA’s scope by emphasizing the priorities of progressive activists instead of pursuing practical goals. These policies include a focus on ‘equity,’ a nebulous concept that in practice means awarding grants to favored identity groups, as well as imposing obligations on states concerning carbon dioxide emissions from highway traffic—areas not encompassed within FHWA’s statutory authorities.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Furchtgott-Roth’s Chapter Criticized The Biden Administration For Making It Harder To “Expand Highway Capacity.”

Project 2025 Criticized The Biden Administration For Making “It Harder For Growing States To Expand Highway Capacity.” “Finally, the Administration has sought to use a ‘guidance memo’ to impose policies not enacted by Congress, most notably to make it harder for growing states to expand highway capacity.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Furchtgott-Roth’s Chapter Complained That “Vision Zero,” Which Seeks To End Traffic Fatalities, Creates Traffic Congestion By Reducing Automobile Speeds And Called For The FHWA To Stay Out Of Local Infrastructure Decisions.

Project 2025 Claimed That The Biden Administration’s Embrace Of “Vision Zero”—Seeking An End To Traffic Fatalities—“Often Means Actively Seeking Congestion For Automobiles To Reduce Speeds.” “Furthermore, the Biden Administration’s embrace of the ‘Vision Zero’ approach to safety often means actively seeking congestion for automobiles to reduce speeds.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Project 2025 Called On Refocusing The FHWA On Maintaining The Highway System And Reducing Federal Involvement In Local Infrastructure Decisions. “Seek to refocus the FHWA on maintaining and improving the highway system. Remove or reform rules and regulations that hamper state governments. Reduce the amount of federal involvement in local infrastructure decisions.” [Project 2025, Chapter 19: Department of Transportation, p. 629, [2023](#)]

Furchtgott-Roth Project 2025 Called For Cutting Funds For Public Transit, Cutting Transit Worker Pay And Benefits, And Allowing Private Ridesharing And Micromobility Options To Be Counted As Public Transit.

Project 2025 Criticized Funding For Public Transit Systems In Light Of Reduced Ridership In The Wake Of The Covid Pandemic. “Regrettably, the 2021 Infrastructure Investment and Jobs Act authorized tens of billions of dollars for the expansion of transit systems even as Americans were moving away from them and into personal vehicles. Lower revenue from reduced ridership is already driving transit agencies to a budgetary breaking point, and added operational costs from system expansions will make this problem worse.” [Project 2025, Chapter 19: Department of Transportation, p. 635, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Stop Using The Highway Trust Fund To “Prop Up Mass Transit” And “Remove Federal Subsidies For Transit.” “It is also vital to move away from using the Highway Trust Fund to prop up mass transit. The fund was driven into insolvency (and repeated

bailouts) through decades of transfers to transit without any increase in transit usage to show for it. With the federal government facing mounting debt, the best course of action would be to remove federal subsidies for transit spending, allowing states and localities to decide whether mass transit is a good investment for them.” [Project 2025, Chapter 19: Department of Transportation, p. 636, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Redefine “Public Transit” To Include Ridesharing And Micromobility Options Like Electric Scooters. “New micromobility solutions, ridesharing, and a possible future that includes autonomous vehicles mean that mobility options—particularly in urban areas—can alter the nature of public transit, making it more affordable and flexible for Americans. Unfortunately, DOT now defines public transit only as transit provided by municipal governments. This means that when individuals change their commutes from urban buses to rideshare or electric scooter, the use of public transit decreases. A better definition for public transit (which also would require congressional legislation) would be transit provided for the public rather than transit provided by a public municipality.” [Project 2025, Chapter 19: Department of Transportation, p. 634-635, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Ensure That Transit Projects Funded Through Capital Investment Grants Meet “Sound Economic Standards And A Rigorous Cost-Benefit Analysis.” “The Capital Investment Grants (CIG) program is another example of Washington’s tendency to fund transit expansion rather than maintaining or improving current facilities. The CIG program, which began in 1991, funds only novel transit projects. These can include new rail lines (regardless of the demand for preexisting rail in the area) and costly operations such as streetcars. Because Americans have demonstrated a strong preference for alternative means of transportation, rather than throwing good money after bad by continuing federal subsidies for transit expansion, there should be a focus on reducing costs that make transit uneconomical. The Trump Administration urged Congress to eliminate the CIG program, but the program has strong support on Capitol Hill. At a minimum, a new conservative Administration should ensure that each CIG project meets sound economic standards and a rigorous cost-benefit analysis.” [Project 2025, Chapter 19: Department of Transportation, p. 635, [2023](#)]

Project 2025 Called On The Next Conservative Administration Administration To Unwind Part Of The Urban Mass Transportation Act Of 1964 That Has Been Interpreted To Prohibit The Reduction Of Compensation For Workers In Transit Systems. “The next Administration can remove the largest obstacle to reforming labor costs. Section 10(c) of the Urban Mass Transportation Act of 1964 was initially intended to protect bargaining rights for workers in privately owned transit systems that were being absorbed by government-operated agencies. The provision has mutated into a requirement that any transit agency receiving federal funds cannot reduce compensation, an interpretation that far exceeds the original statute.” [Project 2025, Chapter 19: Department of Transportation, p. 635, [2023](#)]

- **Project 2025 Claimed That Amending The 1964 Law Would Allow “Transit Agencies To Adjust Fringe Benefits Without Fearing A Federal Lawsuit.”** “Returning to the original intent would allow transit agencies to adjust fringe benefits without fearing a federal lawsuit.” [Project 2025, Chapter 19: Department of Transportation, p. 636, [2023](#)]

Furchtgott-Roth’s Chapter Proposed Breaking Up The Federal Aviation Administration (FAA), Making The FAA “Operate More Like A Business,” Cutting Regulations On Airlines, Allowing For More Airline Consolidation, And Opening Up The Industry To More Foreign Investment.

Project 2025 Called From Separating The Federal Aviation Administration (FAA) From The DOT. “Separate the FAA from DOT or, at a minimum, separate the ATO from the FAA.” [Project 2025, Chapter 19: Department of Transportation, p. 633, [2023](#)]

Project 2025 Called For Splitting The FAA Into Two Pieces, Breaking Off The Air Traffic Service From The Regulatory And Certification Side. “The FAA is 10 years older than DOT. It provides two separate and

functionally different services: the world's largest and most complex Air Navigation Service Provider (ANSP) and, at the same time, the world's largest civil aviation regulatory and certificatory agency. The first is a 24/7/365 air traffic service provider. The second is an inherently governmental organization responsible for ensuring that aerospace operators, vehicles, airports, and ANSPs are properly certified and follow all FAA regulations. These two different organizations ought to run separately." [Project 2025, Chapter 19: Department of Transportation, p. 632, [2023](#)]

Project 2025 Called For Restructuring FAA Funding So That It Isn't Subject To Annual Appropriations Decisions In Congress. "Completely restructure the FAA's funding system so that the nation's aviation system is not held prisoner to annual appropriations or used as a political football to solve nonaviation problems." [Project 2025, Chapter 19: Department of Transportation, p. 633, [2023](#)]

Project 2025 Called For The FAA To "Operate More Like A Business." "Require the FAA to operate more like a business. The FAA has not made good use of the unique authority it has been given in areas like personnel and acquisition." [Project 2025, Chapter 19: Department of Transportation, p. 633, [2023](#)]

Project 2025 Claimed That The Biden Administration Opposed Airline Growth And Joint Ventures Of Small Airlines In Order To "Placate Specific Labor Groups." "The current Administration's policies are self-contradictory. In order to placate specific labor groups, the Biden Administration not only opposes the growth of the major airlines, which would reduce the price of air travel, but also opposes measures—such as low-fare foreign competition and joint ventures of smaller U.S. carriers—that would increase competition." [Project 2025, Chapter 19: Department of Transportation, p. 630, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Publicly Support A Joint Venture Between Smaller Airlines Like Jetblue And Spirit. "Publicly indicate that a new Administration would support joint-venture efforts by smaller carriers (for example, Jet Blue and Spirit) to achieve scale necessary to reduce costs and compete more effectively with the larger carriers." [Project 2025, Chapter 19: Department of Transportation, p. 630, [2023](#)]

Project 2025 Called For A Review Of Foreign Ownership And Control Limitations On Airlines To Allow More Foreign Investment. "Review foreign ownership and control limitations and, if necessary, work with Congress to change existing statutes. Worldwide investors are providing access to capital to foreign airlines for innovations and new equipment purchases that U.S. airlines cannot match. The U.S. should use the Committee on Foreign Investment in the United States (CFIUS) process to keep out nefarious foreign actors while allowing investment from investors in designated like-minded countries so long as U.S.-based investors maintain plurality ownership." [Project 2025, Chapter 19: Department of Transportation, p. 630, [2023](#)]

Project 2025 Called On The Next Conservative Administration To Commit To Approving Or Rejecting Applications For New Airlines Within 12 Months. "Establish a New Entry Initiative that commits the federal government to approving or rejecting the applications of new air carriers within 12 months." [Project 2025, Chapter 19: Department of Transportation, p. 631, [2023](#)]

Furchtgott-Roth Project 2025 Called On The Next Conservative Administration To Consider Repealing The Jones Act, The "Foundational Law Of The American Maritime Industry."

Project 2025 Called On The Next Conservative Administration To Consider "Repealing Or Substantially Reforming The Jones Act." "Serious consideration should be given to repealing or substantially reforming the Jones Act, which would require legislation. The economic costs of the Jones Act, which is notionally in place to promote a robust Merchant Marine, vastly exceed its effect on the supply of domestic ships. For instance, no liquified natural gas (LNG) can be shipped from Alaska to the lower 48 states because there are no U.S.-flagged ships that carry LNG. If there are genuine concerns about U.S. fleet capacity in the absence of

the Jones Act, it would be possible to do so through an expansion of the Defense Reserve Fleet.” [Project 2025, Chapter 19: Department of Transportation, p. 638, [2023](#)]

- **The Jones Act Requires That Merchandise Transported By Water Between Two U.S. Ports Must Be Moved On Vessels That Are “US-Documented, -Owned, -Crewed, And -Built.”** “The Jones Act is the foundational law of the American maritime industry, and compliance with it is essential whether you are a vessel operator in the US domestic trades or a foreign operator serving the US market. The Jones Act requires that merchandise transported by water within the United States be moved on vessels that are US-documented, -owned, -crewed, and -built. And while the basic contours of the law are relatively simple, the applications and nuances of it are far less so.” [K&L Gates, [9/29/23](#)]

Mandy M. Gunasekara, The Author Of Project 2025’s EPA Chapter, Was Chief Of Staff For Trump’s Pro-Industry EPA Is Currently A Principal For A Consulting Firm That Has Lobbied On Behalf Of A China-Based Solar Company, Despite Gunasekara Claiming Biden’s Electric Vehicle Policies Have Served To “Sell Out The American Economy” To China.

Mandy M. Gunasekara, The Author Of Project 2025’s Chapter On The Environmental Protection Agency (EPA), Was Chief Of Staff For Trump’s EPA And Claims To Have Been At The Center Of The Most Consequential Energy And Environmental Decisions Of The Last Decade.”

Mandy M. Gunasekara Is Author Of Project 2025’s Chapter On The Environmental Protection Agency (EPA), Was EPA Chief Of Staff In The Trump Administration, In Addition To Other EPA Roles In The Administration. “Mandy M. Gunasekara of Oxford, Mississippi, is a principal at Section VII Strategies, a Senior Policy Analyst at the Independent Women’s Forum, and Visiting Fellow in the Center for Energy, Climate, and Environment at The Heritage Foundation. During the Trump Administration, Mandy served as the Chief of Staff at the U.S. Environmental Protection Agency as well as Principal Deputy Assistant Administrator for the Office of Air and Radiation. She previously served in numerous roles at the U.S. House of Representatives and U.S. Senate, including as Majority Counsel for the Senate Environment and Public Works Committee under Chairman Jim Inhofe. She received her BA from Mississippi College and her JD from the University of Mississippi School of Law.” [Project 2025, accessed [05/09/24](#)]

ENVIRONMENTAL PROTECTION AGENCY

Mandy M. Gunasekara

[Project 2025, accessed [05/09/24](#)]



Chief of Staff

US Environmental Protection Agency (EPA) · Full-time

Mar 2020 - Jan 2021 · 11 mos

Washington, District of Columbia, United States

[...]



US Environmental Protection Agency (EPA)

2 yrs

- **Principal Deputy Assistant Administrator**
Nov 2017 - Feb 2019 · 1 yr 4 mos
Washington, District Of Columbia
- **Senior Policy Advisor**
Mar 2017 - Feb 2019 · 2 yrs
Washington D.C. Metro Area

[Linkedin profile for Mandy Gunasekara, accessed [05/09/24](#)]

Mandy Gunasekara Claims To Have Been “At The Center Of The Most Consequential Energy And Environmental Decisions Of The Last Decade.” “From the Oval Office to the Senate Cloakroom, Mandy has been at the center of the most consequential energy and environmental decisions of the last decade. She is a veteran Republican climate and energy strategist, communicator, and environmental attorney who has a well-earned reputation for delivering results.” [Section VII Strategies, accessed [05/09/24](#)]

While Chief Of Staff For Trump EPA Administrator Andrew Wheeler, Mandy Gunasekara “Set And Implemented Environmental Policy Priorities” And Worked “To Shepherd Key Regulatory Actions Through The Rule-Making Process.” “Most recently, Mandy served as Chief of Staff of the U.S. Environmental Protection Agency (EPA). Under the leadership of Administrator Andrew Wheeler, Mandy set and implemented environmental policy priorities for the Trump-Pence Administration. She created and managed teams of political and career employees to shepherd key regulatory actions through the rule-making process. Mandy also served as a primary liaison with the White House and other administrative agencies.” [Section VII Strategies, accessed [05/09/24](#)]

Mandy Gunasekara Is Principal At Consulting Firm Section VII Strategies, Which Has Lobbied On Behalf Of China-Based Solar Company Jinkosolar US, For Which Her Husband Is Currently A Counsel, Director, And In-House Lobbyist.

Mandy Gunasekara Has Been Principal At Section VII Strategies, A “Boutique Energy, Environmental, And Tax Policy Consulting Firm,” Since January 2021:



Principal
Section VII Strategies, LLC · Full-time
Jan 2021 - Present · 3 yrs 5 mos
Washington, DC

Section VII Strategies is a boutique energy, environmental, and tax policy consulting firm dedicated to providing curated solutions to meet the business and communications objectives of our clients.

[Linkedin profile for Mandy Gunasekara, accessed [05/09/24](#)]

Mandy Gunasekara’s Firm, Section VII Strategies, Has Lobbied On Behalf Of China-Based Jinkosolar US, A Solar Technology Company:

Registrant Name	Client Name	Report Type	Amount Reported	Filing Year	Posted	Issues
SECTION VII STRATEGIES	JINKOSOLAR US	3rd Quarter - Termination (No		2022	09/30/2022	N/A

		Activity)				
SECTION VII STRATEGIES	JINKOSOLAR US	2nd Quarter - Report	\$20,000.00	2022	07/20/2022	General tax, trade, and customs issues related to the solar industry.; General customs procedure and processes
SECTION VII STRATEGIES	JINKOSOLAR US	1st Quarter - Report		2022	05/05/2022	General tax, trade, and customs issues related to the solar industry.; General customs procedure and processes
SECTION VII STRATEGIES	JINKOSOLAR US	4th Quarter - Report		2021	01/06/2022	General tax, trade, and customs issues related to the solar industry.; General customs procedure and processes
SECTION VII STRATEGIES	JINKOSOLAR US	3rd Quarter - Report		2021	10/22/2021	General tax, trade, and customs issues related to the solar industry.; General customs procedure and processes
SECTION VII STRATEGIES	JINKOSOLAR US	2nd Quarter - Report		2021	07/13/2021	General tax, trade, and customs issues related to the solar industry.; General customs procedure and processes
SECTION VII STRATEGIES	JINKOSOLAR US	Registration		2021	05/01/2021	N/A

[U.S. Senate Lobbying Disclosure Database, accessed [05/09/24](#)]

- JinkoSolar Is A Solar Module Manufacturer Whose Global Headquarters Is In Shanghai, China.**
 “JinkoSolar (NYSE: JKS) is a leading PV module manufacturer and energy storage system integrator.”
 [Jinkosolar US, accessed [05/09/24](#)]



[Jinkosolar US, accessed [05/09/24](#)]

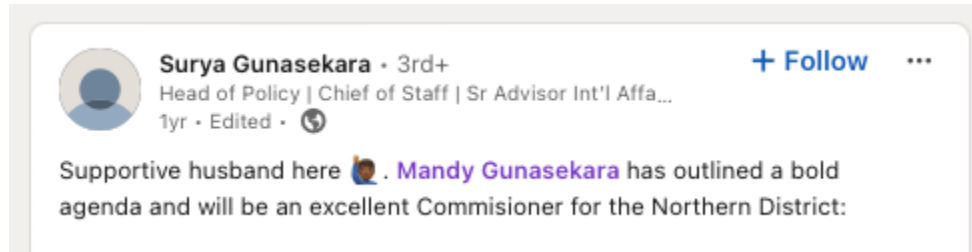
As Recently As The First Quarter Of 2024, Mandy Gunasekara’s Husband—Who Is The Founder Of Section VII Strategies—Has Lobbied On Behalf Of JinkoSolar US As Its Counsel And Director:

Registrant Name	Client Name	Report Type	Amount Reported	Filing Year	Posted	Lobbyist
JINKOSOLAR (U.S.) INC.	JINKOSOLAR (U.S.) INC.	1st Quarter - Report	\$90,000.00	2024	04/18/2024	Surya Gunasekara
JINKOSOLAR (U.S.) INC.	JINKOSOLAR (U.S.) INC.	4th Quarter - Report	\$90,000.00	2023	01/30/2024	Surya Gunasekara

JINKOSOLAR (U.S.) INC.	JINKOSOLAR (U.S.) INC.	3rd Quarter - Report	\$90,000.00	2023	10/03/2023	Surya Gunasekara
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[U.S. Senate Lobbying Disclosure Database, accessed [05/09/24](#)]

- **Mandy Gunsekara’s Husband Is Surya Gunasekara, Who Founded Section VII Strategies And Is Also Counsel And Director For JinkoSolar U.S.:**



[Linkedin post by Surya Gunasekara, accessed [05/09/24](#)]



Founder

Section VII Strategies, LLC - Part-time
Jan 2021 - Present · 3 yrs 5 mos
Oxford, Mississippi, United States

[Linkedin profile for Surya Gunasekara, accessed [05/09/24](#)]



Counsel & Director

JinkoSolar U.S. · Full-time
May 2023 - Present · 1 yr 1 mo
Washington DC-Baltimore Area · Hybrid

[Linkedin profile for Surya Gunasekara, accessed [05/09/24](#)]

Gunasekara Has Hypocritically Claimed That Biden Electric Vehicle Policy Has Worked To “Sell Out The American Economy” To China.

April 2023: Mandy Gunasekara Appeared On Fox Business To Criticize A Biden EPA Draft Rule Encouraging The Sale Of Electric Cars, Claiming That The Administration Works To “Sell Out The American Economy” And That “China Reaps The Benefit.” “Former EPA Chief of Staff Mandy Gunasekara says this EPA proposal would be a ‘defacto ban’ on internal combustion engines and says they do not have the authority to ban certain technology.” [Fox Business via YouTube, 04/10/23, accessed [05/10/24](#)]

- **April 2023: The Biden EPA Announced A Draft Rule To Have Electric Cars Be The Majority Of New Cars Sold By 2032.** “The Biden administration on Wednesday issued one of its most ambitious climate rules, a push that could cause electric cars to make up the majority of U.S. auto sales eight years from now. The final version of the Environmental Protection Agency’s Clean Cars rule is the strictest federal climate regulation ever issued for passenger cars and trucks — even though it offers manufacturers a slightly slower phase-in of pollution limits than the EPA had first proposed last spring. [...] The final standards released Wednesday track most closely with the April 2023 draft rule’s so-called ‘Alternative 3.’” [Politico, [03/20/24](#)]



[Fox Business via YouTube, 04/10/23, accessed [05/10/24](#)]

- Gunasekara Said, “It Is The CCP, Not The American People That Stand To Benefit From This Latest EV Mandate Because The Electric Vehicle Batteries, The Majority Of The Critical Minerals That Go Into Those Batteries Are Owned By The Chinese Communist Party.”** “Under the Biden administration we’ve seen time and time again their willingness to sell out the American economy and our natural interests just to comply with their Green New Deal dreams. And so it is a very good question because it is the CCP, not the American people that stand to benefit from this latest EV mandate because the electric vehicle batteries, the majority of the critical minerals that go into those batteries are owned by the Chinese Communist Party.” [Fox Business via YouTube, 04/10/23, accessed [05/10/24 \(02:45\)](#)]
- Gunasekara Said The Biden Administration “Goes Out Of Its Way Not Only To Sell Out The American Economy But To Shift Reliance On Important Minerals And Resources Overseas, Falling Into The Hands Of The Chinese Communist Party.”** “So there is a lot of questions. I think at the top of that list, should be the national security implications because energy security is directly tied to national security and this administration goes out of its way not only to sell out the American economy but to shift reliance on important minerals and resources overseas, falling into the hands of the Chinese Communist Party.” [Fox Business via YouTube, 04/10/23, accessed [05/10/24 \(03:12\)](#)]
- Gunasekara Said, “China Loves The Fact That American Democrats, The Party In Power Right Now That They Are Pushing Their Green New Deal Agenda Because It Shuts Down Important Industrial Actors Here In The United States.”** “China loves the fact that American Democrats, the party in power right now that they are pushing their Green New Deal agenda because it shuts down important industrial actors here in the United States. And that productivity and those jobs materialize in China, where on paper they will pretend like they care about the environment but they really don’t.” [Fox Business via YouTube, 04/10/23, accessed [05/10/24 \(06:44\)](#)]
- Gunasekara Claimed That, Under His Environmental Policies, “Biden Has To Shut Down American Industries And China Reaps The Benefit.”** “[Host:] if you want a green agenda, you want to spend American taxpayer money, shouldn’t we develop American companies that can, that can produce products for the green agenda, not rely on China themselves? [Gunasekara] Yeah, you would

think so. but the problem is that they keep prioritizing politics over the needs of the American people. The Democrats, they set arbitrary timelines and standards, for example, the reducing emissions 50% by 2030, that Joe Biden promised under the Paris Climate Accord, that is not realistic. Instead of being honest, admitting that, he wants to hold to that standard, to hold to that standard he has to shut down American industries and China reaps the benefit.” [Fox Business via YouTube, 04/10/23, accessed [05/10/24 \(06:00\)](#)]

Gunasekara Founded The Energy 45 Fund, A Non-Profit To Argue For “The Environmental And Economic Gains Made Under The Trump Administration” That Has Since Become The Satoshi Action Fund, A Bitcoin Advocacy Group, With Gunasekara Still Listed As A Director And Co-Founder.

Mandy Gunasekara Founded The Energy 45 Fund, A 501(c)(4) Non-Profit “Dedicated To Informing The Public About The Environmental And Economic Gains Made Under The Trump Administration.” “The Energy 45 Fund (Energy 45) is a Jackson, Mississippi based 501(c)(4) non-profit educational organization dedicated to informing the public about the environmental and economic gains made under the Trump Administration.” [Linkedin profile for Mandy Gunasekara, accessed [05/09/24](#)]

[Linkedin profile for Mandy Gunasekara, accessed [05/09/24](#)]

- **In Its 2022 Tax Filing, The Energy 45 Fund Became The Satoshi Action Fund, A Bitcoin Advocacy Group, With Amanda Gunasekara Still Serving As A Director:**

C Name of organization SATOSHI ACTION FUND	
Doing business as	
Number and street (or P.O. box if mail is not delivered to street address) 1102 VAN BUREN AVENUE	Room/suite
City or town, state or province, country, and ZIP or foreign postal code OXFORD, MS 38655	

[...]

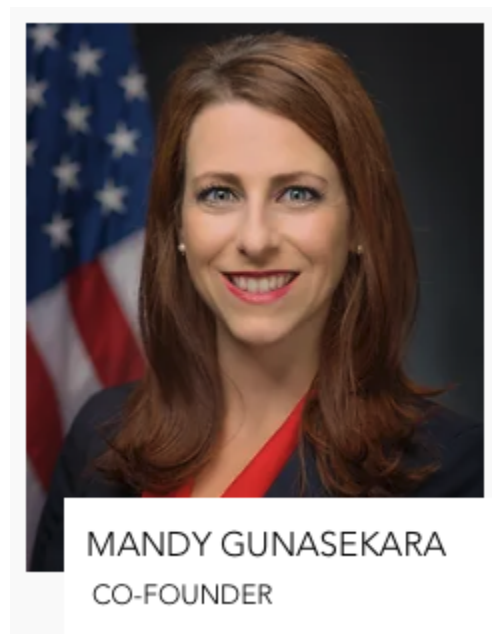
Part I	Summary
1	Briefly describe the organization’s mission or most significant activities: SATOSHI ACTION IS DEDICATED TO THE BELIEF THAT BTC MINING IS A TOOL FOR CONTINUED HUMAN PROGRESS AND WORKS TO CULTIVATE A WELCOMING ENVIRONMENT FOR INVESTMENT AND INNOVATION THROUGHOUT THE UNITED STATES.

[...]

(1) AMANDA GUNASEKARA DIRECTOR
(2) SURYA GUNASEKARA DIRECTOR
(3) SAMUEL D PORTER CEO

[The Satoshi Action Fund IRS Form 990, 2022, [11/15/23](#)]

- **Mandy Gunasekara Is Listed As A Co-Founder Of The Sathoshi Action Fund:**



[Satoship Action Fund, accessed [05/10/24](#)]

Gunasekara’s Project 2025 Chapter Claims That The EPA Has Pushed An “Economy-Destroying Agenda,” Has Been “Coopted By The Left,” And Infiltrated By “Embedded Activists”—Gunasekara Prescribes A “Major Reorganization” In The Office Of The Administrator And A “Day One Executive Order” To Review Or Halt Key EPA Activities.

Mandy Gunasekara’s Project 2025 Chapter Claimed That Under Biden, The Environmental Protection Agency (EPA) Has Had A “Top-Down, Coercive Approach,” Pushed An “Assault On The Energy Sector,” And Enacted “Costly, Job-Killing Regulations” As Part Of An “Economy-Destroying Agenda.”

Gunasekara Said “The EPA Needs To Be Realigned Away From Attempts To Make It An All-Powerful Energy And Land Use Policymaker And Returned To Its Congressionally Sanctioned Role As Environmental Regulator.” “Further, the EPA needs to be realigned away from attempts to make it an all-powerful energy and land use policymaker and returned to its congressionally sanctioned role as environmental regulator.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Said That Under The Biden Administration, The EPA “Has Returned To The Same Top-Down, Coercive Approach That Defined The Obama Administration,” Claiming Biden Has Pushed An “Assault On The Energy Sector” While “Forcing The Economy To Build Out And Rely On Unreliable Renewables.” “Not surprisingly, the EPA under the Biden Administration has returned to the same top-down, coercive approach that defined the Obama Administration. There has been a reinstatement of unachievable standards designed to aid in the ‘transition’ away from politically disfavored industries and technologies and toward the Biden Administration’s preferred alternatives. This approach is most obvious in the Biden Administration’s assault on the energy sector as the Administration uses its regulatory might to make coal, oil, and natural gas operations very expensive and increasingly inaccessible while forcing the economy to build out and rely on unreliable renewables.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Claimed That Under Biden, “We See The Return Of Costly, Job-Killing Regulations That Serve To Depress The Economy And Grow The Bureaucracy,” Even Pushing Industries “Overseas To Countries Whose Enforcement Of Pollution-Control Requirements Is Seriously Deficient.” “As a consequence of this approach, we see the return of costly, job-killing regulations that serve to depress the economy and grow the bureaucracy but do little to address, much less resolve, complex environmental problems. In some instances, these actions even work to undermine environmental efforts as they push industries overseas to countries whose enforcement of pollution-control requirements is seriously deficient—if indeed they have any meaningful requirements at all.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Claimed That Under Biden, The EPA Administrator “Has Been Overshadowed By The Creation Of Multiple “Climate Czars” Who Help Push An “Expansive, Costly, And Economy-Destroying Agenda.” “Compared to the Obama Administration, there is one key difference in the Biden Administration’s approach: In a concerted effort to diminish congressional oversight, the position of EPA Administrator has been overshadowed by the creation of multiple ‘Climate Czars’ at the Biden White House. In effect, current EPA Administrator Michael Regan, who has a reputation as a well-meaning, generally capable former state official, has been left out of the political loop, serving mostly as a pleasant distraction from EPA’s expansive, costly, and economy-destroying agenda.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Said “EPA’s Structure And Mission Should Be Greatly Circumscribed To Reflect The Principles Of Cooperative Federalism And Limited Government,” Which Will Require “Significant Restructuring And Streamlining.” “EPA’s structure and mission should be greatly circumscribed to reflect the principles of cooperative federalism and limited government. This will require significant restructuring and streamlining of the agency to reflect the following:” [Project 2025, accessed [05/09/24](#)]

Gunasekara’s Chapter Claims That The EPA Is “Amenable To Being Coopted By The Left,” That “Embedded Activists” In The EPA Seek To “Evade Legal Restraints In Pursuits Of A Global, Climate-Themed Agenda” That Pushes “Liberty-Crushing Regulations.”

Mandy Gunasekara’s Project 2025 Chapter Claimed That The Environmental Protection Agency (EPA) “Has Long Been Amenable To Being Coopted By The Left For Political Ends.” “The challenge of creating a conservative EPA will be to balance justified skepticism toward an agency that has long been amenable to being coopted by the Left for political ends against the need to implement the agency’s true function: protecting public health and the environment in cooperation with states.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Claimed That In The EPA, “Embedded Activists Have Sought To Evade Legal Restraints In Pursuit Of A Global, Climate-Themed Agenda.” “The EPA has been a breeding ground for expansion of the federal government’s influence and control across the economy. Embedded activists have sought to evade legal restraints in pursuit of a global, climate-themed agenda, aiming to achieve that agenda by implementing costly policies that otherwise have failed to gain the requisite political traction in Congress. Many EPA actions

in liberal Administrations have simply ignored the will of Congress, aligning instead with the goals and wants of politically connected activists.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Claimed “An EPA Led By Activism And A Disregard For The Law Has Generated Uncertainty In The Regulated Community, Vendetta-Driven Enforcement, Weighted Analytics, Increased Costs, And Diminished Trust In Final Agency Actions.” “Beyond creating such immediate and tangible harm in various communities, an EPA led by activism and a disregard for the law has generated uncertainty in the regulated community, vendetta-driven enforcement, weighted analytics, increased costs, and diminished trust in final agency actions.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Claimed The Left Mischaracterizes Climate Change “To Scare The American Public Into Accepting Their Ineffective, Liberty-Crushing Regulations, Diminished Private Property Rights, And Exorbitant Costs.” “Mischaracterizing the state of our environment generally and the actual harms reasonably attributable to climate change specifically is a favored tool that the Left uses to scare the American public into accepting their ineffective, liberty-crushing regulations, diminished private property rights, and exorbitant costs.” [Project 2025, accessed [05/09/24](#)]

Gunasekara’s Chapter Calls For “A Major Reorganization” Of The EPA’s Office Of The Administrator, Creating A Deputy Chief Of Staff For Regulatory Improvement, And Eliminating The Stand-Alone Office Of Environmental Justice And External Civil Rights And Office Of Enforcement And Compliance Assistance.

Gunasekara Claimed That The EPA’s Office Of The Administrator (AO) Will “Have To Undergo A Major Reorganization,” Including Turning The Deputy Chief Of Staff For Policy Into The Deputy Chief Of Staff For Regulatory Improvement. “The Office of the Administrator (AO) is intended to provide executive and logistical support for the EPA Administrator. Its stated purpose is to support EPA leadership and activities. To implement policies that are consistent with a conservative EPA, the agency will have to undergo a major reorganization. The Deputy Chief of Staff for Policy position within the Administrator’s office should be renamed the Deputy Chief of Staff for Regulatory Improvement.” [Project 2025, accessed [05/09/24](#)]

Gunasekara’s Chapter Called For Eliminating The Stand-Alone Office Of Environmental Justice And External Civil Rights. “Returning the environmental justice function to the AO, eliminating the stand-alone Office of Environmental Justice and External Civil Rights.” [Project 2025, accessed [05/09/24](#)]

Gunasekara’s Chapter Calls For Eliminating The Stand-Alone Office Of Enforcement And Compliance Assistance. “Returning the enforcement and compliance function to the media offices (air, water, land, and emergency management, etc.) and eliminating the stand-alone Office of Enforcement and Compliance Assistance, which has created a mismatch between standard-setting and implementation.” [Project 2025, accessed [05/09/24](#)]

Gunasekara’s Chapter Calls For A “Day One Executive Order” To Reconsider The EPA’s Structure, Review Its Existing Rules, Stop All Grants To Advocacy Groups, Downsize The Agency’s Workforce, And Stop Any EPA Activity That Doesn’t Have “Clear And Current Congressional Authorization.”

Gunasekara’s Chapter Calls For A “Day One Executive Order” With “Explicit Language Requiring Reconsideration Of The Agency’s Structure” And Setting Up “Pause And Review Teams” To Review The EPA’s Structure. “Day One Executive Order. To initiate the review and reorganization, a Day One executive order should be drafted for the incoming President with explicit language requiring reconsideration of the agency’s structure with reference to fulfilling its mission to create a better environmental tomorrow with

clean air, safe water, healthy soil, and thriving communities. The order should set up ‘pause and review’ teams to assess the following:” [Project 2025, accessed [05/09/24](#)]

Gunasekara Calls For A Review Of “Existing Rules To Be Stayed And Reproposed.” “Major Rules and Guidance Materials. Identify existing rules to be stayed and repropose and initiate rule development in appropriate media offices.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Calls For A Review Of “New Petitions For Rule Reconsideration And Stays Of Rules.” “Pending Petitions. Grant new petitions for rule reconsideration and stays of rules.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Calls To “Stop All Grants To Advocacy Groups And Review Which Potential Federal Investments Will Lead To Tangible Environmental Improvements.” “Grants. Stop all grants to advocacy groups and review which potential federal investments will lead to tangible environmental improvements.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Calls For An Employee Review To “Determine The Opportunity To Downsize By Terminating The Newest Hires In Low-Value Programs.” “Employee Review. Determine the opportunity to downsize by terminating the newest hires in low-value programs and identify relocation opportunities for Senior Executive Service (SES) positions.” [Project 2025, accessed [05/09/24](#)]

Gunasekara Calls For A Budget Review That Will “Cut Costs, Reduce The Number Of Full-Time Equivalent (FTE) Positions, And Eliminate Duplicative Programs,” Adding That EPA Should Not Proceed With Any Activity “For Which There Is Not Clear And Current Congressional Authorization.” “Budget Review. Develop a tiered-down approach to cut costs, reduce the number of full-time equivalent (FTE) positions, and eliminate duplicative programs. EPA should not conduct any ongoing or planned activity for which there is not clear and current congressional authorization, and it should communicate this shift in the President’s first budget request.” [Project 2025, accessed [05/09/24](#)]

Karen Kerrigan, Author Of Project 2025’s Small Business Administration (SBA) Chapter, Is The Longtime President Of The Small Business & Entrepreneurship Council (SBE Council), Which Has Spent At Least \$480,000 On Federal Lobbying During The Biden Administration, Which Kerrigan Has Loudly Criticized.

Karen Kerrigan, Author Of Project 2025’s Chapter On The Small Business Administration (SBA), Has Been The President And CEO Of The Small Business & Entrepreneurship Council (SBE Council) For Three Decades.

Karen Kerrigan, Author Of Project 2025’s Chapter On The Small Business Administration, Is President And CEO Of The Small Business & Entrepreneurship Council (SBE Council). “Karen Kerrigan is President and CEO of the Small Business & Entrepreneurship Council and has helped to strengthen U.S. entrepreneurship and global business growth for 28 years. She has provided counsel across the globe via training missions focused on entrepreneurial development, effective advocacy, policy formation, and implementation. Karen testifies regularly before Congress and has served on numerous federal advisory boards representing the interests of entrepreneurs and small businesses.” [Project 2025, accessed [05/09/24](#)]

SMALL BUSINESS ADMINISTRATION

Karen Kerrigan

[Project 2025, accessed [05/09/24](#)]

- **Kerrigan Has Been President & CEO Of The SBE Council Since 1994:**



President & CEO

Small Business & Entrepreneurship Council

Jan 1994 - Present - 30 yrs 5 mos

Nonprofit, nonpartisan advocacy, education and research organization dedicated to protecting small business and promoting entrepreneurship. For nearly 25 years, SBE Council has worked to advance policies and initiatives to create strong and supportive ecosystems for new business creation and business growth. www.sbecouncil.org

[Linkedin profile for Karen Kerrigan, accessed [05/10/24](#)]

Kerrigan Is Board Member And Former Chair Of The Center For International Private Enterprise (CIPE), Which Claims To Strengthen Democracy “Through Private Enterprise And Market-Oriented Reform”:



Board Member, Audit Committee Chair, Executive Committee, Former Chair

Center for International Private Enterprise (CIPE)

Apr 2011 - Present - 13 yrs 2 mos

Washington, D.C.

The Center for International Private Enterprise (CIPE) strengthens democracy around the globe through private enterprise and market-oriented reform. CIPE is one of the four core institutes of the National Endowment for Democracy. Since 1983, CIPE has worked with business leaders, policymakers, and journalists to build the civic institutions vital to a democratic society.

[Linkedin profile for Karen Kerrigan, accessed [05/10/24](#)]

Kerrigan Is A Founding Member Of The World Entrepreneurship Forum, Which She Calls “A Worldwide Think Tank Devoted To The Entrepreneur, Creator Of Wealth And Social Justice”:



Founding Member

World Entrepreneurship Forum

Nov 2008 - Present - 15 yrs 7 mos

A Worldwide think tank devoted to the entrepreneur, creator of wealth and social justice.

[Linkedin profile for Karen Kerrigan, accessed [05/10/24](#)]

The SBE Council Has Spent At Least \$480,000 On Federal Lobbying During The Biden Administration, While Kerrigan Has Loudly Criticized “Tax Hikes,” “Regulatory Directives,” And “Government Micromanagement.”

From Q1 2021 Through Q1 2024, SBE Council Has Spent \$480,000 On Federal Lobbying, With Karen Kerrigan Appearing On Every Lobbying Disclosure:

Registrant Name	Client Name	Report Type	Filing Year	Posted	Amount Reported
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	1st Quarter - Report	2024	04/22/24	\$45,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	4th Quarter - Report	2023	01/22/24	\$30,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	3rd Quarter - Report	2023	10/20/23	\$25,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	2nd Quarter - Report	2023	07/19/23	\$40,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	1st Quarter - Report	2023	04/20/23	\$30,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	4th Quarter - Report	2022	01/20/23	\$35,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	3rd Quarter - Report	2022	10/24/22	\$45,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	2nd Quarter - Report	2022	07/20/22	\$55,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	1st Quarter - Report	2022	04/20/22	\$45,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	4th Quarter - Report	2021	02/01/22	\$35,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	3rd Quarter - Report	2021	10/22/21	\$30,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	2nd Quarter - Report	2021	08/09/21	\$35,000.00
Small Business & Entrepreneurship Council (SBE Council)	Small Business & Entrepreneurship Council (SBE Council)	1st Quarter - Report	2021	05/05/21	\$30,000.00
				Total:	\$480,000.00

[U.S. Senate Lobbying Disclosure Database, accessed [05/10/24](#)]

SBE Council Has Lobbied Broadly On “Regulation,” Among Many Other Issues, As Recently As The First Quarter Of 2024:

16. Specific lobbying issues

[...]

Regulation

[U.S. Senate Lobbying Disclosure Database, accessed [04/22/24](#)]

May 2024: In An SBE Council Statement Against The Biden ‘National Labor Relations Board’s “Costly New Joint Employer Standard,” Kerrigan Said, “The President Continues To Favor Some Special Interests And Costly Policies Over Main Street America, As The Gush Of New Regulations Is Undercutting Entrepreneurs At Every Turn.” “National Small Business Week is nearing a close and rather than end on a positive note for America’s small businesses, President Joe Biden ended the week as he started, by announcing a policy action that undermines American small businesses and entrepreneurial opportunity. Today, President Biden vetoed a resolution (H.J. Res 98) that passed on a bipartisan basis in the House and Senate to overturn the National Labor Relations Board’s (NLRB’s) expansive and costly new joint employer standard. Small Business & Entrepreneurship Council (SBE Council) president & CEO Karen Kerrigan issued the following statement in response: ‘President Biden has clearly communicated where small business stands in his Administration. The President continues to favor some special interests and costly policies over Main Street America, as the gush of new regulations is undercutting entrepreneurs at every turn.’” [Small Business & Entrepreneurship Council, [05/03/24](#)]

March 2024: In A SBE Council Statement On President Biden’s State Of The Union Address, Kerrigan Claimed Biden’s Agenda Will “Extract More Capital From Businesses And Individuals Through Tax Hikes And Regulatory Directives, Undermine Intellectual Property Protections, And Promote Government Micromanagement Of Large Swaths Of The American Economy And Our Workplaces.” “Washington, D.C. – Small Business & Entrepreneurship Council (SBE Council) president & CEO Karen Kerrigan issued the following statement in response to President Biden’s State of the Union address: ‘Private sector businesses need capital and policy stability in order to help steady the choppy economic and market challenges that have persisted beyond the COVID era. Unfortunately, President Biden is pushing policies that will do the opposite – ones that extract more capital from businesses and individuals through tax hikes and regulatory directives, undermine intellectual property protections, and promote government micromanagement of large swaths of the American economy and our workplaces.’” [Small Business & Entrepreneurship Council, [03/08/24](#)]

Karen Kerrigan’s Project 2025 Chapter Claimed That The SBA Has Become “Hyperfocused” On Inclusivity, Asserted Its Office Of Advocacy Can Be “A Powerful Weapon” In Obstructing All Other Agencies’ Rules, And Complained About Widespread SBA Pandemic Loan Fraud, Which Was Due To Gross Negligence By The Trump Administration.

Karen Kerrigan’s Project 2025 Chapter Complained That The Small Business Administration (SBA) Has Become “A Sprawling, Unaccountable Agency” That Has Been “Hyperfocused” On Inclusivity, To The Benefit Of “Disproportionately Impacted,’ Politically Favored, Or Geographically Situated Small Businesses And Entrepreneurs.”

Karen Kerrigan’s Project 2025 Chapter Echoed House Republicans’ “Concern About SBA [Small Business Administration] Mission Creep And The Need To Make A Sprawling, Unaccountable Agency More Focused And Operationally Sound.” “As noted, Republicans in the U.S. House of Representatives

have evidenced concern about SBA mission creep and the need to make a sprawling, unaccountable agency more focused and operationally sound.” [Project 2025, accessed [05/09/24](#)]

Kerrigan’s Chapter Complained About The SBA’s Inclusivity Efforts, Claiming The Agency Has Been “Hyperfocused On ‘Disproportionately Impacted,’ Politically Favored, Or Geographically Situated Small Businesses And Entrepreneurs.” “Moreover, there is unease that the agency has moved from being open to any eligible small business searching for support to being hyperfocused on ‘disproportionately impacted,’ politically favored, or geographically situated small businesses and entrepreneurs. Today, initiatives aimed at ‘inclusivity’ are in fact creating exclusivity and stringent selectivity in deciding what types of small businesses and entities can use SBA programs.” [Project 2025, accessed [05/09/24](#)]

Kerrigan Complained That A Trump Administration Rule To Have SBA “Remove All Of The Unconstitutional Religious Exclusions From Its Regulations,” That The SBA “Still Uses Religious Exclusions In Determining Eligibility For Business Loans.” “For example, even though the SBA under President Donald Trump proposed a rule to remove all of the unconstitutional religious exclusions from its regulations to conform with Supreme Court decisions that have made their unconstitutionality clear, the SBA has not acted on the proposed rule and still uses religious exclusions in determining eligibility for business loans.” [Project 2025, accessed [05/09/24](#)]

Kerrigan’s Chapter Called For “Reforming And Restructuring The SBA,” Which She Said Serves “Special Interests In Washington, D.C.

Kerrigan’s Chapter Prescribed “Reforming And Restructuring The SBA,” Claiming It Serves “Special Interests In Washington, D.C.” “Reforming and restructuring the SBA under a conservative Administration would meet the needs of America’s small-business owners and entrepreneurs, not special interests in Washington, D.C. Entrepreneurs believe the SBA is fairly archaic in its operations and programming and must be transformed to serve small businesses in the modern economy effectively. Therefore, a restructured and reformed SBA would end the long-term deficiencies, practices, and problems that have prolonged the decades-long cycle of waste, fraud, and mismanagement.” [Project 2025, accessed [05/09/24](#)]

Kerrigan’s Chapter Called For Strengthening The SBA’s Office Of Advocacy, Claiming It “Could Be A Powerful Weapon Against The Administrative State’s Regulatory Extremism” And Could Serve As A Check On All Federal Agency Rules.

Kerrigan Called For Strengthening The SBA’s Office Of Advocacy, Claiming It “Could Be A Powerful Weapon Against The Administrative State’s Regulatory Extremism.” “Strengthening the Office of Advocacy. The SBA Office of Advocacy (Advocacy) is ‘an independent office’ within the SBA. It accounts for about one one-thousandth of SBA spending and 0.75 percent of SBA personnel. Under the Regulatory Flexibility Act, both under its current authority and with suggested reforms, the Office of Advocacy could be a powerful weapon against the administrative state’s regulatory extremism.” [Project 2025, accessed [05/09/24](#)]

Kerrigan Called For Amending The Regulatory Flexibility Act (RFA) So All Federal Agencies Must Seek Input From The SBA’s Office Of Advocacy When Proposing Rulemakings. “Amend the RFA so that all agencies are required to provide a copy of any proposed rule (other than bona fide emergency rules) along with initial regulatory flexibility analysis to the Office of Advocacy at least 60 days before a notice of proposed rulemaking is submitted for publication in the Federal Register. The Office of Advocacy would submit comments to agencies within 30 days, and each agency would have to consider these comments, make changes in the proposed rule based on those comments, or explain in a revised regulatory flexibility analysis why it chose not to change the proposed rule.” [Project 2025, accessed [05/09/24](#)]

Kerrigan Called For Expanding The RFA's Economic Analysis Requirements To Include Indirect Costs Along With Direct Costs Of Regulations. "RFA economic analysis should be expanded to include indirect costs along with direct costs. In addition, the next Administration should require other agencies to seek Advocacy's input. Currently, other agencies deny Advocacy the ability to enforce their duty to consider the effect of regulations on small entities by construing their regulations as not having significant economic impact, which would otherwise serve as a trigger for Advocacy's input." [Project 2025, accessed [05/09/24](#)]

- **Kerrigan Called On The Next Conservative Administration To "Explicitly Direct Federal Agencies To Comply With The RFA."** "Explicitly direct federal agencies to comply with the RFA. This would be similar to the approach adopted by President Trump in his January and February 2017 executive orders directing agencies to relieve the cost and burden of regulation on business." [Project 2025, accessed [05/09/24](#)]

Kerrigan Called For Increasing The SBA's Office Of Advocacy's Budget By 50%, To Hire Additional "Attorneys, Economists, And Scientists And Enhance Its Role In The Regulatory Process." "Increase the Office of Advocacy's budget by at least 50 percent (\$4.6 million). This would allow Advocacy to hire approximately 25 attorneys, economists, and scientists and enhance its role in the regulatory process." [Project 2025, accessed [05/09/24](#)]

Kerrigans Chapter Pointed To The SBA's Pandemic-Era Loan Relief Programs As Examples Of "Waste, Fraud, And Mismanagement Of Taxpayer Dollars"—The Trump Administration's Handling Of These Programs Resulted In "The Biggest Fraud In A Generation," With Its SBA Failing To Enact Even "Basic Safeguards" Against EIDL Fraud And Erasing Millions Of Flags On Suspicious PPP Loans In The Trump Administration's Last Days.

Kerrigan's Chapter Complained That "Various SBA Programs Have Generated Waste, Fraud, And Mismanagement Of Taxpayer Dollars." "Because of its distinct role in the federal government, the SBA became the default agency for providing disaster loans to small businesses, homeowners, renters, and organizations. As a result, hundreds of billions of taxpayer dollars have been funneled through the agency to businesses and individuals over the years. Some SBA programs are effective; others are not. The largest program in SBA's history, the Paycheck Protection Program (PPP), has been credited with saving millions of jobs during the COVID-19 pandemic. A conservative Administration would rightly focus on saving small businesses during such a crisis. At the same time, however, various SBA programs have generated waste, fraud, and mismanagement of taxpayer dollars." [Project 2025, accessed [05/09/24](#)]

Kerrigan's Chapter Complained That The SBA's Economic Injury Disaster Loan (EIDL) Pandemic Relief Program Allowed Over \$78 Billion In "Potentially Fraudulent" Loans To Ineligible Entities, Which "Represented More Than Half Of All Funds Spent Through The Program." "For example, and more recently, more than \$1 trillion in COVID-19 relief was distributed through the SBA. The SBA's EIDL (Economic Injury Disaster Loan) Advance program in particular shows the dangers that can come with direct government lending. EIDL Advance provided direct cash grants and loans to small businesses. The SBA Office of Inspector General 'identified \$78.1 billion in potentially fraudulent EIDL loans and grants paid to ineligible entities,' which represented more than half of all funds spent through the program." [Project 2025, accessed [05/09/24](#)]

Kerrigan's Chapter Also Complained About At Least 70,000 Potentially Fraudulent Loans Under SBA's Paycheck Protection Program (PPP), Another Pandemic Relief Effort. "Although PPP worked through private lenders and as a result experienced relatively less fraud than EIDL experienced, it is estimated 'that at least 70,000 [PPP] loans were potentially fraudulent.'" [Project 2025, accessed [05/09/24](#)]

July 2022: The House Select Subcommittee On The Coronavirus Crisis Issued A Report On The Trump Administration's Mismanagement Of The EIDL Program, Showing How The Administration "Failed To

Implement Basic Safeguards To Prevent Fraud, Even Directing Loan Reviewers To Approve Applications With Serious Fraud Alerts Without Taking Any Steps To Ensure That The Applications Were Legitimate.” “Today, in advance of a hearing on fraud in federal pandemic relief programs, the Select Subcommittee on the Coronavirus Crisis, chaired by Rep. James E. Clyburn, released a new staff report on the Trump Administration’s mismanagement of the Small Business Administration’s (SBA) COVID-19 Economic Injury Disaster Loan (EIDL) program. The report demonstrates how the Trump Administration failed to implement basic safeguards to prevent fraud, even directing loan reviewers to approve applications with serious fraud alerts without taking any steps to ensure that the applications were legitimate.” [Select Subcommittee on the Coronavirus Crisis, [07/14/22](#)]

As Much As \$80 Billion, Or 10%, Of \$800 Billion In PPP Loans Were Fraudulent, With Justice Department Inspector General Michael Horowitz Finding That The Trump Administration Made The Program An “Invitation” For Fraud And A Government Watchdog Finding That The Trump Administration Erased Millions Of Flags On Suspicious PPP Loans In Its Lame Duck Period. “They bought Lamborghinis, Ferraris and Bentleys. And Teslas, of course. Lots of Teslas. Many who participated in what prosecutors are calling the largest fraud in U.S. history — the theft of hundreds of billions of dollars in taxpayer money intended to help those harmed by the coronavirus pandemic — couldn’t resist purchasing luxury automobiles. Also mansions, private jet flights and swanky vacations. They came into their riches by participating in what experts say is the theft of as much as \$80 billion — or about 10 percent — of the \$800 billion handed out in a Covid relief plan known as the Paycheck Protection Program, or PPP. [...] ‘Nothing like this has ever happened before,’ said Matthew Schneider, a former U.S. attorney from Michigan who is now with Honigman LLP. ‘It is the biggest fraud in a generation.’” [NBC News, [03/28/22](#)]

- **Justice Department Inspector General Michael Horowitz, Who Oversaw COVID Relief Efforts, Said The Trump Loan Programs “Were Structured In Ways That Made Them Ripe For Plunder,” Were “An Invitation” For Fraud, And Lacked “Even Minimal Checks To Make Sure That The Money Was Getting To The Right People At The Right Time.”** “Justice Department Inspector General Michael Horowitz, who oversees Covid relief spending, told "NBC Nightly News" anchor Lester Holt in an exclusive interview that Covid relief programs were structured in ways that made them ripe for plunder. ‘The Small Business Administration, in sending that money out, basically said to people, ‘Apply and sign and tell us that you’re really entitled to the money,’ said Horowitz, the chair of the Pandemic Response Accountability Committee. ‘And, of course, for fraudsters, that’s an invitation. ... What didn’t happen was even minimal checks to make sure that the money was getting to the right people at the right time.’” [NBC News, [03/28/22](#)]
- **The Project For Government Oversight (POGO) Issued An “Explosive” Report Showing That In The Final Days Of The Trump Administration, His SBA Eliminated 2.7 Million Flags On Suspicious PPP Loans, Including 99% Of Special Review Flags For Loans Of Over \$2 Million.** “An explosive new investigation of data from the Paycheck Protection Program (PPP) finds that, in Donald Trump’s final days in office, his administration rushed to eliminate oversight for loans which were flagged for potential fraud or further investigation — and wiped flags from nearly every one of the largest PPP loans. As the Project on Government Oversight (POGO) revealed in a report published Wednesday, over the course of several weeks before President Joe Biden was inaugurated, the Trump administration went on a spree of eliminating flags on PPP loans, the majority of which went directly to personally enriching the richest Americans. Officials in the Small Business Administration (SBA) eliminated 2.7 million flags between December 2020 and January 2021, as the administration was in its lame duck period. Special preference was given to the largest loans, which often also went to the largest corporations. On January 16, 2021, four days before President Joe Biden’s inauguration, Trump’s SBA wiped 99 percent of special review flags, which were given out to every loan above \$2 million for separate investigatory purposes.” [Truthout, [10/06/22](#)]

Bernard L. McNamee, Author Of Project 2025’s Energy Dept. Chapter, Helps Clients On “High-Stakes” Issues As Partner At BigLaw Law Firm McGuireWoods, Where He Also Serves As Senior Advisor For The Firm’s Consulting Practice, Which Serves Controversial Corporations Like Altria And Sinclair Broadcast Group.

Bernard L. McNamee, Author Of Project 2025’s Chapter On The Department Of Energy, Is A Partner At Major Law Firm McGuireWoods Where He Assists Clients On “High-Stakes And Complex Issues.”

Bernard L. McNamee, Author Of Project 2025’s Chapter On The Department Of Energy And Related Commissions, Is A Partner At McGuireWoods And A Senior Advisor At Its Subsidiary McGuireWoods Consulting. “Bernard L. McNamee is an energy and regulatory attorney with a major law firm and was formerly a member of the Federal Energy Regulatory Commission. He is also the Street Distinguished Visiting Professor of Law at the Appalachian School of Law. In addition to serving as a Federal Energy Regulatory Commissioner, McNamee has served in various senior policy and legal positions throughout his career, including at the U.S. Department of Energy, for U.S. Senator Ted Cruz, and for Virginia Governor George Allen. McNamee also served four attorneys general in two states (Virginia and Texas).” [Project 2025, accessed [05/09/24](#)]

**DEPARTMENT OF ENERGY
AND RELATED COMMISSIONS**

Bernard L. McNamee

[Project 2025, accessed [05/09/24](#)]



[McGuireWoods, accessed [05/10/24](#)]

- **McNamee Is Also A Senior Advisor At McGuireWoods Consulting.** “Former FERC Commissioner Bernard L. McNamee is a partner at McGuireWoods and a senior advisor at McGuireWoods Consulting.” [McGuireWoods, accessed [05/10/24](#)]

McNamee “Provides Clients Legal, Policy And Legislative Guidance On A Wide Range Of Energy And Environmental Issues.” “McNamee provides clients legal, policy and legislative guidance on a wide range of energy and environmental issues.” [McGuireWoods, accessed [05/10/24](#)]

McNamee’s Practice “Focuses On Strategic Planning And Policy Development, Legislation, And Rulemakings, Including Issues Involving Congress, The U.S. Department Of Energy, The Environmental Protection Agency, And The Federal Energy Regulatory Commission (FERC).” “His practice focuses on strategic planning and policy development, legislation, and rulemakings, including issues involving Congress, the U.S. Department of Energy, the Environmental Protection Agency, and the Federal Energy Regulatory Commission (FERC), as well as regional transmission organizations (RTOs) and independent system operators (ISOs).” [McGuireWoods, accessed [05/10/24](#)]

- **McNamee “Works With Private Equity Investors And Portfolio Companies To Help Them Understand The Implications Of Federal And State Energy Policy Decisions.”** “In addition, McNamee works with private equity investors and portfolio companies to help them understand the implications of federal and state energy policy decisions and market trends for their investment and business decisions.” [McGuireWoods, accessed [05/10/24](#)]

Mcnamee “Assists Clients With High-Stakes And Complex Issues” Involving Major Federal Laws, Including The Interstate Commerce Act And The Renewable Fuel Standard. “McNamee assists clients with high-stakes and complex issues involving the Federal Power Act (FPA), Natural Gas Act (NGA), Public Utility Regulatory Policies Act (PURPA), Interstate Commerce Act (ICA), and Renewable Fuel Standard (RFS).” [McGuireWoods, accessed [05/10/24](#)]

Mcnamee “Develops Coalitions For Clients And Works With State Attorneys Generals In Developing Multilevel Engagement On Important Energy And Environmental Issues.” “McNamee develops coalitions for clients and works with state attorneys generals in developing multilevel engagement on important energy and environmental issues.” [McGuireWoods, accessed [05/10/24](#)]

McNamee Is Also A Senior Advisor For McGuireWoods’ Consulting Practice, Which Has Been Paid \$670,000 By Dominion Resources During The Biden Administration, And Represents Controversial Corporations Altria, DeVry University, Perdue Foods, And Sinclair Broadcast Group.

McNamee Is Also A Senior Advisor At McGuireWoods Consulting. “Former FERC Commissioner Bernard L. McNamee is a partner at McGuireWoods and a senior advisor at McGuireWoods Consulting.” [McGuireWoods, accessed [05/10/24](#)]

In The First Quarter Of 2024 Alone, McGuireWoods Has Lobbied On Behalf Of Over 60 Entities, Including Altria, DeVry University, Perdue Foods, And Sinclair Broadcast Group:

Registrant Name	Client Name
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Altria Client Services
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Americans For Transparency And Accountability
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Aspen Consulting Service, Llc On Behalf Of Kerecis, Inc.
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Auto Care Association
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Axon Enterprise
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Baltimore Urban Revitalization, Llc
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Bezos Earth Fund Llc
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Biomass Energy Systems, Inc. (Besi)
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Blue Star Nbr, Llc
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Buckeye Partners, L.P.
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Cape Fox Corporation
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Chester County Wastewater Recovery
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Concordance Healthcare Solutions
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	County Of Kane, Illinois
McguireWoods Consulting (A Subsidiary Of McguireWoods LLP)	Devry University

McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Digitalcm, Llc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Dominion Resources Inc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Dupage County, Il
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Figg Bridge Engineers, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Finger Paint One, Llc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Fulton County
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Gabrielino/Tongva Nation
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Hampton University
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Hillside Atlanta
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Immersicom
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Indiana Economic Development Corporation
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Insightec, Ltd.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Lithos Carbon
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Lumbee Tribe Holdings, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Marymount University
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Maximus, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Mit45, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Mitsubishi Power Americas, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Mm-Law Llc (On Behalf Of Certain American Veterans & Gold Star Families)
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Mortgage Research Center, Llc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	National Association Of Locum Tenens Organizations (Nalto)
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Neighbors Bank
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Nexans High Voltage Usa
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Northern Moraine Wastewater Reclamation District
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Northern Virginia Community College Educational Foundation, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Opportunities Industrialization Center Of America, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Oregon Department Of Consumer And Business Services
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Paramount Tax & Accounting
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Partners In Performance
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Perdue Foods Llc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Public Media Venture Group
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Ronald Mcdonald House Of Charleston
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Sinclair Broadcast Group, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Superior Air-Ground Ambulance Service, Inc.
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Technology-Media-Telecom Capital Group, Inc. (Tmt, Inc.)
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	The Leaven Group Llc
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	The Virginia Foundation For Community College Education
McquireWoods Consulting (A Subsidiary Of McquireWoods LLP)	Theodore Roosevelt Presidential Library Foundation

McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Tire Pros Francorp, Llc
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Turtle Mountain Band Of Chippawa
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	United Network For Organ Sharing (Unos)
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Ute Mountain Ute Tribe
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Victims Of Terrorism - East Africa
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Village Of Evergreen Park
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Village Of Franklin Park
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Webmyers Construction

[U.S. Senate Lobbying Disclosure Database, accessed [05/10/24](#)]

During The Biden Administration, McGuireWoods Consulting Has Been Paid \$670,000 By Dominion Energy Inc., Also Known As Dominion Energy, Inc.:

Registrant Name	Client Name	Report Type	Filing Year	Amount Reported
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	1st Quarter - Report (No Activity)	2024	\$100,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	4th Quarter - Report (No Activity)	2023	
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	3rd Quarter - Report	2023	\$60,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	2nd Quarter - Report	2023	\$60,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	1st Quarter - Report	2023	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	4th Quarter - Amendment	2022	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	3rd Quarter - Report	2022	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	2nd Quarter - Report	2022	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	1st Quarter - Report	2022	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	4th Quarter - Report	2021	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	3rd Quarter - Report	2021	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	2nd Quarter - Report	2021	\$50,000.00
McGuireWoods Consulting (A Subsidiary Of McGuireWoods LLP)	Dominion Resources Inc	1st Quarter - Amendment	2021	\$50,000.00
			Total:	\$670,000.00

[U.S. Senate Lobbying Disclosure Database, accessed [05/17/24](#)]

- **2017: Dominion Resources, Inc. Became Dominion Energy, Inc.** “Dominion Resources, Inc., has become Dominion Energy, Inc. (NYSE: D), after a vote by shareholders today to change the company's name.” [Dominion Energy, [05/10/17](#)]

McNamee’s Project 2025 Chapter, Claiming The Biden Department Of Energy (DOE) Has Created “A New Energy Crisis” Through “Extreme ‘Green’ Policies,” Called For Eliminating Major DOE Offices Related To Energy Efficiency And Net-Zero Carbon Goals, As Well As More Funding For Nuclear Warhead Deployment And Ending Nonproliferation Efforts.

Bernard McNamee’s Project 2025 Chapter Claimed That Under The Biden Department Of Energy (DOE), “Ideologically Driven Government Policies Have Thrust The United States Into A New Energy Crisis” Caused By “Extreme ‘Green’ Policies.”

McNamee’s Project 2025 Chapter On The U.S. Department Of Energy (DOE) Called For Bold Policy Action And Reforms That Involve The U.S. Department Of Energy (DOE); The Federal Energy Regulatory Commission (Ferc); And The Nuclear Regulatory Commission (NRC)." “The next conservative Administration should prioritize energy and science dominance to ensure that Americans have abundant, affordable, and reliable energy; create good-paying jobs; support domestic manufacturing and technology leadership; and strengthen national security. Achieving these goals will require bold policy action and reforms that involve the U.S. Department of Energy (DOE); the Federal Energy Regulatory Commission (FERC); and the Nuclear Regulatory Commission (NRC).” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Claimed That “Ideologically Driven Government Policies Have Thrust The United States Into A New Energy Crisis Just A Few Short Years After America’s Energy Renaissance.” “Access to affordable, reliable, and abundant energy is vital to America’s economy, national security, and quality of life. Yet ideologically driven government policies have thrust the United States into a new energy crisis just a few short years after America’s energy renaissance, which began in the first decade of the 2000s, transformed the United States from a net energy importer (oil and natural gas) to energy independence and then energy dominance.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Claimed That ““Americans Now Face Energy Scarcity” Caused By “Extreme ‘Green’ Policies,” Including Those Dedicated To “‘Combating Climate Change’ And ‘ESG’ (Environmental, Social, And Governance).” “Americans now face energy scarcity, an electric grid that is less reliable, and artificial shortages of natural gas and oil despite massive reserves within the United States—all of which has led to higher prices that burden both the American people and the economy. The new energy crisis is caused not by a lack of resources, but by extreme ‘green’ policies. Under the rubrics of ‘combating climate change’ and ‘ESG’ (environmental, social, and governance), the Biden Administration, Congress, and various states, as well as Wall Street investors, international corporations, and progressive special-interest groups, are changing America’s energy landscape.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Warned That “Energy Scarcity Will Allow Government, Either Directly Or Through Access To Banks And Wall Street Investors, To Decide Who Is ‘worthy’ To Receive Funding For Energy Projects,” Calling It “Dangerous.” “Moreover, increased energy scarcity will allow government, either directly or through access to banks and Wall Street investors, to decide who is ‘worthy’ to receive funding for energy projects. In the end, government control of energy is control of people and the economy. This is one reason why the trend toward nationalization of our energy industry through government mandates, bans on the production and use of oil and natural gas, and nationalization of the electric grid is so dangerous.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Criticized Biden Administration Investment In Wind And Solar, Instead Of “Reliable Fossil Fuels,” And Called For The Repeal Of The Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA).

McNamee’s Chapter Criticized The Biden Administration For “Plowing Taxpayer Dollars Into Intermittent Wind And Solar Projects And Ending The Use Of Reliable Fossil Fuels.” “Yet the current Administration’s first concern is plowing taxpayer dollars into intermittent wind and solar projects and ending the use of reliable fossil fuels. A conservative President must be committed to unleashing all of America’s energy resources and making the energy economy serve the American people, not special interests. This means that the next conservative Administration should:” [Project 2025, accessed [05/09/24](#)]

McNamee Pushed An “All Of The Above” Energy Policy. “Affirm an ‘all of the above’ energy policy through which the best attributes of every resource can be harnessed for the benefit of the American people.” [Project 2025, accessed [05/09/24](#)]

McNamee Called For The Repeal Of The Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA). “Support repeal of massive spending bills like the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA), which established new programs and are providing hundreds of billions of dollars in subsidies to renewable energy developers, their investors, and special interests, and support the rescinding of all funds not already spent by these programs.” [Project 2025, accessed [05/09/24](#)]

McNamee Called On The Next Conservative Administration To “Stop The War On Oil And Natural Gas.” “Stop the war on oil and natural gas.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called For Eliminating DOE’s “Special-Interest Funding Programs,” Including ARPA-E, Clean Energy Offices, And Its Energy Technology Development Loan Program.

McNamee’s Chapter Called For Eliminating “Special-Interest Funding Programs,” Including The DOE Office of Clean Energy Demonstrations (OCED), Office of State and Community Energy Programs, ARPA-E, Office of Grid Deployment (OGD), And The DOE Loan Program. “Eliminate special-interest funding programs. Many DOE energy funding programs are not targeted on fundamental science and technology; instead, they focus more on commercialization and act as subsidies to the private sector for government-favored resources. The DOE Office of Clean Energy Demonstrations (OCED); Office of State and Community Energy Programs; ARPA-E; Office of Grid Deployment (OGD); and DOE Loan Program should be eliminated or reformed. If they continue to exist, FECM, NE, OE, and EERE should focus on fundamental science and technology issues, particularly in relation to cyber and physical threats to energy security, rather than subsidizing and commercializing energy resources.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called For Eliminating “Political And Climate-Change Interference In DOE Approvals Of Liquefied Natural Gas (LNG) Exports.” “Eliminate political and climate-change interference in DOE approvals of liquefied natural gas (LNG) exports. In addition, Congress should reform the Natural Gas Act to expand required approvals from merely nations with free trade agreements to all of our allies, such as NATO countries.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On DOE To “Should Stop Using Energy Policy To Advance Politicized Social Agendas.”

McNamee’s Chapter Said DOE Should “Should Stop Using Energy Policy To Advance Politicized Social Agendas,” Including Those On “Energy Justice,’ Justice, And DEI.” “Focus on energy and science

issues, not politicized social programs. The next Administration should stop using energy policy to advance politicized social agendas. Programs that sound innocuous, such as ‘energy justice,’ Justice, and DEI, can be transformed to promote politicized agendas. DOE should focus on providing all Americans with access to abundant, affordable, reliable, and secure energy, and DOE should manage its employees so that everyone is treated fairly based on his or her talent, skills, and hard work.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On DOE To Fund The “Deployment Of New Nuclear Warheads” And To End Nonproliferation Activities, “Like Those Involving Iran And The United Nations.”

McNamee’s Chapter Called On The DOE To “Fund The Design, Development, And Deployment Of New Nuclear Warheads.” “The U.S. nuclear arsenal needs to be updated and reinvigorated if we are to be able to deal effectively with threats from China, Russia, and other adversaries. As a semi-autonomous agency, the NNSA has the primary responsibility for researching and designing new nuclear warheads and for ensuring that the existing nuclear arsenal is still potent. [...] Fund the design, development, and deployment of new nuclear warheads, including the production of plutonium pits in quantity.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On The DOE To “End Ineffective And Counterproductive Nonproliferation Activities Like Those Involving Iran And The United Nations.” “End ineffective and counterproductive nonproliferation activities like those involving Iran and the United Nations.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On DOE To Eliminate The Office Of Fossil Energy And Carbon Management (FECM), Whose Mission Is To “Minimize The Environmental Impacts Of Fossil Fuels While Working Towards Net-Zero Emissions.”

McNamee’s Chapter Targeted DOE’s Office Of Fossil Energy And Carbon Management (FECM), Whose Mission Is To “Minimize The Environmental Impacts Of Fossil Fuels While Working Towards Net-Zero Emissions.” “OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT (FECM) [...] DOE is authorized by law to increase the conversion efficiency of all forms of fossil energy, reduce costs, improve environmental performance, and increase the energy security of the United States. In recent years, the Office of Fossil Energy (FE) has been transformed from its statutory role of improving fossil energy production to one that is focused primarily on reducing the carbon dioxide emissions from fossil fuel extraction, transport, and combustion. This change is reflected in the office’s new name, the Office of Fossil Energy and Carbon Management (FECM), effective as of July 2021, and FECM’s mission: ‘to minimize the environmental impacts of fossil fuels while working towards net-zero emissions.’” [Project 2025, accessed [05/09/24](#)]

McNamee Called On DOE To Eliminate FECM, Claiming “Taxpayer Dollars Should Not Be Used To Subsidize Preferred Businesses And Energy Resources, Thereby Distorting The Market And Undermining Energy Reliability.” “Eliminate FECM. The next Administration should work with Congress to eliminate all of DOE’s applied energy programs, including those in FECM (with the possible exception of those that are related to basic science for new energy technology). Taxpayer dollars should not be used to subsidize preferred businesses and energy resources, thereby distorting the market and undermining energy reliability.” [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On DOE To Eliminate The Office of Energy Efficiency and Renewable Energy (EERE), Whose Mission Is To “Equitably Transition America To Net-Zero Greenhouse Gas (GHG) Emissions.”

McNamee’s Chapter Targeted DOE’s Office of Energy Efficiency and Renewable Energy (EERE), Whose Mission Is To “Accelerate The Research, Development, Demonstration, And Deployment Of

Technologies And Solutions To Equitably Transition America To Net-Zero Greenhouse Gas (GHG) Emissions Economy-Wide By No Later Than 2050.” “The Office of Energy Efficiency and Renewable Energy traces its roots to the Energy Policy and Conservation Act of 1975, but most of its programs today are rooted in the Energy Policy Act of 2005. Under the Biden Administration, EERE’s mission is ‘to accelerate the research, development, demonstration, and deployment of technologies and solutions to equitably transition America to net-zero greenhouse gas (GHG) emissions economy-wide by no later than 2050’ and ‘ensure [that] the clean energy economy benefits all Americans.’ [Project 2025, accessed [05/09/24](#)]

McNamee’s Chapter Called On DOE To Eliminate EERE, Claiming “Taxpayer Dollars Should Not Be Used To Subsidize Preferred Businesses And Energy Resources, Thereby Distorting The Market And Undermining Energy Reliability.” “Eliminate EERE. The next Administration should work with Congress to eliminate all of DOE’s applied energy programs, including those in EERE (with the possible exception of those that are related to basic science for new energy technology). Taxpayer dollars should not be used to subsidize preferred businesses and energy resources, thereby distorting the market and undermining energy reliability.” [Project 2025, accessed [05/09/24](#)]

McNamee Also Called On DOE To “Eliminate Energy Efficiency Standards For Appliances.” “Eliminate energy efficiency standards for appliances. The next Administration should work with Congress to modify or repeal the law mandating energy efficiency standards. Before (or in lieu of) repealing the law, there are steps the agency can take to refocus on the consumer by giving full force to the provisions already in the law that serve to limit regulatory overreach and protect against excessively stringent standards.” [Project 2025, accessed [05/09/24](#)]

The Radical MAGA Project 2025’s Chapter On Reforming The White House Office Was Authored By Former Trump Deputy Chief Of Staff Rick Dearborn, Who Is Now A Lobbyist Who Has Worked For Amazon Web Services, Citigroup, Meta Platforms, Shell USA, And Verizon...

Rick Dearborn, Former Trump Deputy Chief Of Staff And Executive Director Of Trump’s Transition Team, Authored The Radical MAGA Project 2025’s Chapter On Reforming The White House Office.

Rick Dearborn Authored The “Radical” MAGA Project 2025 Chapter On Reforming The White House Office:

WHITE HOUSE OFFICE

Rick Dearborn

[Project 2025, accessed [05/01/24](#)]

- **Project 2025, Led By The Conservative Heritage Foundation, Is A Radical MAGA Plan To “Roll Back Nothing Less Than 100 Years” Of “Liberal Encroachment” Through The Administrative State—The Plan Proposes To “Defund The Department Of Justice, Dismantle The FBI, Break Up The Department Of Homeland Security And Eliminate The Departments Of Education And Commerce.”** “In truth, the program laid out by Dans and his fellow Trumpers, called Project 2025, is far more ambitious than anything Ronald Reagan dreamed up. Dans, from his seat inside The Heritage Foundation, and scores of conservative groups aligned with his program are seeking to roll back nothing less than 100 years of what they see as liberal encroachment on Washington. They want to overturn what began as Woodrow Wilson’s creation of a federal administrative elite and later grew into a vast, unaccountable and mostly liberal bureaucracy (as conservatives view it) under Franklin

Roosevelt's New Deal and Lyndon Johnson's Great Society, numbering about two and a quarter million federal workers today. They aim to defund the Department of Justice, dismantle the FBI, break up the Department of Homeland Security and eliminate the Departments of Education and Commerce, to name just a few of their larger targets. [...] And they want to ensure that what remains of this slashed-down bureaucracy is reliably MAGA conservative — not just for the next president but for a long time to come — and that the White House maintains total control of it." [Politico, [09/19/23](#)]

Dearborn Was Previously Deputy Chief Of Staff For President Donald Trump, Where He Was “Responsible For The Day-To-Day Operations Of Five Separate Departments Of The Executive Office Of The President.” “Rick Dearborn served as Deputy Chief of Staff for President Donald Trump and was responsible for the day-to-day operations of five separate departments of the Executive Office of the President.” [Project 2025, accessed [05/01/24](#)]

- **Dearborn Was Deputy Chief Of Staff From January 2017 To March 2018.** “From January of 2017 until mid-March of 2018, Mr. Dearborn served The President of the United States as his Deputy Chief of Staff. Mr. Dearborn was responsible for the day-to-day operations of ~100 staff in five separate Executive Office of the President (EOP) departments.” [Bipartisan Policy Center, accessed [05/01/24](#)]

Dearborn “Oversaw The White House’s Political Operation, Public Outreach And Legislative-Affairs Teams.” “As one of President Donald Trump’s top aides, Mr. Dearborn oversaw the White House’s political operation, public outreach and legislative-affairs teams. He announced his resignation in December and remained on staff until last month.” [The Wall Street Journal, [04/16/18](#)]

Dearborn Was Executive Director Of Trump’s 2016 Transition Team. “He also served as Executive Director of the 2016 President-elect Donald Trump transition team.” [Project 2025, accessed [05/01/24](#)]

In His Project 2025 Chapter, Dearborn Writes That The White House Counsel “Must Take Seriously The Duty To Protect The Powers And Privileges Of The President From Encroachments By Congress, The Judiciary, And The Administrative Components Of Departments And Agencies.” “In Chapter 1, former deputy chief of staff to the President Rick Dearborn writes that the White House Counsel ‘must take seriously the duty to protect the powers and privileges of the President from encroachments by Congress, the judiciary, and the administrative components of departments and agencies.’” [Project 2025, accessed [05/01/24](#)]

Dearborn Is Now A Partner For Consulting Firm Mindset, Where He Has Focused On Financial Services, Housing Finance And Capital Markets, And Has Lobbied On Behalf Of 23 Companies And Industry Groups, Including Amazon Web Services, Citigroup, Meta Platforms, Shell USA, And Verizon.

Since April 2018, Dearborn Has Been A Partner At Mindset, A Consulting Firm Which Was Known As The Cypress Group When Dearborn Joined As A Partner:



Partner

Mindset · Full-time

Apr 2018 - Present · 6 yrs 2 mos

655 New York Avenue, NW, Washington, District of Columbia, United States

[Linkedin Profile for Rick Dearborn, accessed [05/01/24](#)]

- **April 2018: Dearborn Was Named A Partner At The Cypress Group, A D.C.-Based Consulting Firm That Specialized In The “Legislative And Regulatory Effect On Businesses.”** “Former White House Deputy Chief of Staff Rick Dearborn has been named partner at the Cypress Group, a

Washington-based consulting firm that specializes in the legislative and regulatory effect on businesses.” [The Wall Street Journal, [04/16/18](#)]

- **October 2020: The Cypress Group Was Renamed To Mindset.** “The Cypress Group this week announced that it is rebranding with a new name and renewed focus. Beginning today, this bipartisan public policy firm will be known as Mindset and it will expand its work on issues that will be at the center of the policy debate in 2021 and beyond.” [Mindset, [10/07/20](#)]

Mindset Touts Dearborn’s “Special Expertise In The Trade, Agriculture, Defense, Energy, Healthcare, And Telecom Sectors.” “Rick is a senior policy professional with three decades of experience ranging from service under two US Presidents and six US senators to postings at a premier think tank and a major DC trade association. Rick has special expertise in the trade, agriculture, defense, energy, healthcare, and telecom sectors.” [Mindset, accessed [05/01/24](#)]



[Mindset, accessed [05/01/24](#)]



[Mindset, accessed [05/01/24](#)]

When Dearborn Joined, Cypress Focused On “Washington’s Impact On Financial Services, Housing Finance And Capital Markets, Among Others.” “Cypress, which also includes a lobbying practice, focuses on Washington’s impact on financial services, housing finance and capital markets, among others.” [The Wall Street Journal, [04/16/18](#)]

October 2019: Mindset Announced That Dearborn And Other Partners Would Receive Founder Pat Cave’s Interest In The Firm. “Mindset, a Washington, DC-based bipartisan strategic advisory and advocacy firm today announced the transfer of Founder Pat Cave’s interest in the company to Partners Rick Dearborn, Langston Emerson, Bridget Hagan, Brant Imperatore, Jeb Mason, King Mueller, and Courtney Taylor.” [Mindset, [10/02/19](#)]

Dearborn Has Lobbied For 23 Companies And Trade Groups, Including Amazon Web Services, Citigroup, Meta Platforms, Shell USA, And Verizon:

Registrant Name	Client Name
MINDSET ADVOCACY, LLC	AMAZON WEB SERVICES

MINDSET ADVOCACY, LLC	AMERICAN WOOD COUNCIL
MINDSET ADVOCACY, LLC	CITIGROUP WASHINGTON INC
MINDSET ADVOCACY, LLC	COMMERCIAL METALS COMPANY
MINDSET ADVOCACY, LLC	COURIER PLUS, INC. DBA DUTCHIE
MINDSET ADVOCACY, LLC	EMERSON ELECTRIC CO.
MINDSET ADVOCACY, LLC	FORWARDLINE FINANCIAL
MINDSET ADVOCACY, LLC	HCBS ADVOCACY, LLC
MINDSET ADVOCACY, LLC	INVESCO LTD
MINDSET ADVOCACY, LLC	LPL FINANCIAL LLC
MINDSET ADVOCACY, LLC	MANUFACTURED HOUSING INSTITUTE
MINDSET ADVOCACY, LLC	META PLATFORMS, INC.
MINDSET ADVOCACY, LLC	METROPOLITAN LIFE INSURANCE COMPANY
MINDSET ADVOCACY, LLC	MUTUAL OF OMAHA INSURANCE COMPANY
MINDSET ADVOCACY, LLC	NEW YORK LIFE INSURANCE COMPANY
MINDSET ADVOCACY, LLC	PIPELINE HEALTH SYSTEM
MINDSET ADVOCACY, LLC	RED ROCK BIOFUELS, LLC
MINDSET ADVOCACY, LLC	SHELL USA, INC.
MINDSET ADVOCACY, LLC	STELLAR DEVELOPMENT FOUNDATION
MINDSET ADVOCACY, LLC	THE ALLIANCE FOR TRADE ENFORCEMENT (AFTE)
MINDSET ADVOCACY, LLC	US WINE TRADE ALLIANCE
MINDSET ADVOCACY, LLC	VERIZON COMMUNICATIONS INC
MINDSET ADVOCACY, LLC	ZERO ABUSE PROJECT

[Search for Registrant: Mindset and Lobbyist: Dearborn, U.S. Senate Lobbying Disclosure Database, accessed [05/03/24](#)]

...Dearborn’s Project 2025 Chapter Said The White House Should “Move Rapidly” To Confront “Wokeism” In The Federal Government, Called For The Presidential Personnel Office To Be A “Personnel Link” For Outside Conservative Organizations, And To Consider Ending The Media’s Permanent Presence On White House Grounds.

Dearborn’s Chapter Said The White House Should “Move Rapidly” To Confront “Wokeism” In The Federal Government And To Combat “The Left’s Aggressive Attacks On Life And Religious Liberty.”

Dearborn’s Chapter Said White House Policy Councils Should “Move Rapidly” To “Promote Energy Production, Combating The Left’s Aggressive Attacks On Life And Religious Liberty, And Confronting ‘Wokeism’ Throughout The Federal Government.” “While other chapters will cover specific policy goals for each department or agency, incoming policy councils will need to move rapidly to lead policy processes around cross-cutting agency topics, including countering China, enforcing immigration laws, reversing regulatory

policies in order to promote energy production, combating the Left's aggressive attacks on life and religious liberty, and confronting 'wokeism' throughout the federal government." [Project 2025, accessed [05/01/24](#)]

Dearborn's Chapter Said The Presidential Personnel Office Should Serve As A "Personnel Link Between Conservative Organizations And The Executive Branch."

Dearborn's Chapter Said That It Was The Presidential Personnel Office' (PPO's) Role To Train And Connect "Political Personnel" And Serve As A "Personnel Link Between Conservative Organizations And The Executive Branch." The Office of Presidential Personnel is responsible for: [...] Training and connecting political personnel. [...] Serving as a personnel link between conservative organizations and the executive branch." [Project 2025, accessed [05/01/24](#)]

Dearborn's Chapter Called Low-Level Political Appointees "The 'Farm Team' For The Conservative Movement."

Dearborn's Chapter Claimed That Political Appointees In Entry-Level Jobs "Proved To Be The 'Farm Team' For The Conservative Movement." "Frequently, many medium-tier and top-tier jobs have been filled by policy experts tasked with accomplishing much of the work of the Administration. At the same time, appointees in the entry-level jobs have brought invaluable energy and commitment to the White House and have proved to be the "farm team" for the conservative movement." [Project 2025, accessed [05/01/24](#)]

Project 2025 Called On The Next Conservative Administration To Reevaluate Its Relationship With The News Media, Arguing The Media Has "No Legal Entitlement" To Workspace On White House Grounds, And Suggesting That "Main-Stream Media" Doesn't Portray Conservative Presidents' Agendas "Effectively And Accurately."

Project 2025 Called On The Next Conservative Administration To Consider Whether The White House Press Corps Should Have Space On The White House Campus. "No legal entitlement exists for the provision of permanent space for media on the White House campus, and the next Administration should reexamine the balance between media demands and space constraints on the White House premises." [Project 2025, accessed [05/01/24](#)]

Project 2025 Said That The Next Conservative Administration Should Consider Working With An Organization Other Than The White House Correspondents Association On Media Affairs. "The new Administration should examine the nature of the relationship between itself and the White House Correspondents Association and consider whether an alternative coordinating body might be more suitable." [Project 2025, accessed [05/01/24](#)]

Project 2025 Wrote That The Communications Director For The Next Conservative President Should Be Able To Navigate "The Main-Stream Media To Ensure That The President's Agenda Is Conveyed Effectively And Accurately." "The Communications Director must convey the President's mission to the American people. Especially for conservatives, this means navigating the main-stream media to ensure that the President's agenda is conveyed effectively and accurately." [Project 2025, Chapter 1: White House Office, p. 30, [2023](#)]

Brooks D. Tucker, Author Of Project 2025's Veterans Affairs (VA) Dept. Chapter, Has Lobbied On Behalf Of Loyal Source, A U.S. Customs and Border Protection Contractor That Has Faced Widespread Scrutiny For "Years Of Deficient Medical Care," Including The Death Of A Child In CBP Custody.

Brooks D. Tucker, Who Authored Project 2025's Chapter On The Department Of Veterans Affairs, Has Lobbied On Behalf Of Loyal Source, A U.S. Customs And Border Protection (CBP) Medical Contractor Subject To Whistleblower Complaints Of "Years Of Deficient Medical Care" And Millions Of Dollars In Overbilling.

Brooks D. Tucker, Who Wrote Project 2025's Chapter On The Department Of Veterans Affairs, Was Assistant Secretary for Congressional and Legislative Affairs And Acting Chief Of Staff For The Trump Department Of Veterans. "Brooks D. Tucker served in the U.S. Department of Veterans Affairs as Assistant Secretary for Congressional and Legislative Affairs from 2017 to 2021 and as Acting Chief of Staff from 2020 to 2021. He helped to craft the policy framework for President-elect Trump's transition team and served as the Senior Policy Adviser for National Security and Veterans Affairs to Senator Richard Burr from 2010 to 2015. A retired Marine lieutenant colonel, Brooks served in Afghanistan, Iraq, North Africa, the Caucasus, and the Western Pacific. He is a graduate of the University of Maryland, Marine Corps Infantry Officer Course, and Marine Corps Command and Staff College and holds a Certificate in Legislative Studies from Georgetown University." [Project 2025, accessed [05/09/24](#)]

**DEPARTMENT OF
VETERANS AFFAIRS**

Brooks D. Tucker

[Project 2025, accessed [05/09/24](#)]

Tucker Is Currently Listed As A Lobbyist For The Spectrum Group, Where He Serves On The Firm's Teams For Government Relations, Healthcare & Bio-Science, The Marine Corps, And Strategic Communications. "Mr. Tucker supports clients working in U.S. government arenas with his extensive expertise in the Department of Veterans Affairs (VA) and Department of Defense (DoD), as well as in Congressional affairs. He delivers substantial experience advising clients on how to effectively communicate and promote their business interests to key decision-makers in Congress and the federal government, and how to achieve successful results from government challenges." [The Spectrum Group, accessed [05/10/24](#)]



The Honorable Brooks D. Tucker
Teams: Government Relations, Healthcare & Bio-
Science, Marine Corps, Strategic Communications

Expertise Areas

- Defense and Veterans Issues
- Department of Veterans Affairs (VA)
- Congressional Affairs and Government Relations
- Strategic Communications
- Crisis Communications & Management
- Executive Leadership Training and Teambuilding
- Business Development and Strategic Planning

[The Spectrum Group, accessed [05/10/24](#)]

From Q1 2022 Through Q4 2022, Brooks Lobbied On Behalf Of Loyal Source:

Registrant Name	Client Name	Report Type	Amount Reported	Filing Year	Posted	Issue
THE SPECTRUM GROUP	LOYAL SOURCE	4th Quarter - Termination	\$0	2022	1/19/2023	Proposed statutory change to the FY2023 Department of Homeland Security authorization/appropriations legislation to allow licensure portability for medical support providers contracted by DHS.
THE SPECTRUM GROUP	LOYAL SOURCE	3rd Quarter - Amendment	\$0	2022	1/9/2023	Proposed statutory change to the FY2023 Department of Homeland Security authorization/appropriations legislation to allow licensure portability for medical support providers contracted by DHS.
THE SPECTRUM GROUP	LOYAL SOURCE	2nd Quarter - Amendment	\$0	2022	1/9/2023	Proposed statutory change to the FY2023 Department of Homeland Security authorization/appropriations legislation to allow licensure portability for medical support providers contracted by DHS.
THE SPECTRUM GROUP	LOYAL SOURCE	Registration	\$0	2022	10/20/2022	N/A

[U.S. Senate Lobbying Disclosure Database, accessed [05/10/24](#)]

- **At The Time, Loyal Source Was The “Primary Medical Services Provider” For U.S. Customs And Border Protection (CBP), Where Medical Officers And Investigators Raise “Growing Concerns” About The Quality And Safety Of Loyal Source’s Care.** “Loyal Source has been the primary medical services provider for CBP since 2020, and has obtained CBP contracts worth roughly \$700 million since 2015, government records show. [...] Officials at CBP, which is conducting the investigation, say Loyal Source is the only company currently large enough to deliver medical services at the scale needed by the government. But medical officers and investigators at the agency have raised growing concerns about the quality and safety of that care.” [The Washington Post, [11/19/23](#)]

- November 2023: After An 8-Year Old Girl In CBP Custody Died, A Senior CBP Official Filed A Whistleblower Complaint About Loyal Source’s “40 Percent Staffing Deficits, Employees Working Without Proper Clearances And Licenses, And Billing Errors Resulting In Overpayments Of Millions Of Dollars.”** “A senior U.S. Customs and Border Protection official Thursday filed a whistleblower complaint with Congress alleging his supervisors failed to adequately monitor the agency’s medical service contractor for staffing shortages, unsafe care and other problems before the May death of an 8-year-old girl in U.S. custody. Attorneys for Troy Hendrickson, a 15-year CBP veteran, told lawmakers in a letter that their client was reassigned by supervisors after raising concerns about the track record of medical contractor Loyal Source Government Services. The company is a finalist for a new five-year, \$1.5 billion CBP contract. Hendrickson’s concerns about Loyal Source included what he described as 40 percent staffing deficits, employees working without proper clearances and licenses, and billing errors resulting in overpayments of millions of dollars, among other issues, according to his attorneys.” [The Washginton Post, [11/30/23](#)]
- February 2024: Sen. Dick Durbin (D-IL) Highlighted Additional CBP And Former Loyal Source Whistleblowers Alleging “Years Of Deficient Medical Care At CBP Facilities And CBP’s Failure To Ensure Proper Oversight Of Loyal Source.”** “U.S. Senate Majority Whip Dick Durbin (D-IL), Chair of the Senate Judiciary Committee, today released the following statement regarding additional Customs and Border Protection (CBP) employee whistleblowers, as well as former Loyal Source—the agency’s medical care contractor—staff whistleblowers, alleging years of deficient medical care at CBP facilities and CBP’s failure to ensure proper oversight of Loyal Source.” [Sen. Dick Durbin, [02/16/24](#)]

Brooks Tucker’s Project 2025 Chapter Falsely Gave Trump Credit For Department Of Veterans Affairs Service Improvements, Complained About Its Unionized Workforce And DEI Policies, And Called On The VA To Rescind A Biden Administration Policy Allowing Abortion Counseling And Procedures After The Fall Of Roe V. Wade.

Brooks Tucker’s Project 2025 Chapter Falsely Claimed That The Veterans Affairs Department (VA) Was “Held In Low Esteem” At The End Of The Obama Administration To Being “One Of The Most Respected U.S. Agencies” Under Trump—Major Veterans Organizations Urged Trump To Reappoint Obama’s VA Secretary, And Trump Ultimately Appointed The Secretary’s Deputy.

Brooks Tucker’s Chapter 2025 Chapter Claimed The Department Of Veterans Affairs (VA) Was “Held In Low Esteem” By The End Of The Obama Administration And Had Become “One Of The Most Respected U.S. Agencies” By 2020, Under The Trump Administration. “At the end of the Obama Administration, the VA was held in low esteem both by the veterans it served and by the employees who served these former warriors. Eroding morale caused by the downstream effects of a health care access crisis in 2014 led to the resignation of Secretary Eric Shinseki and extensive oversight investigations by Congress from 2015–2016. By 2020, however, the VA had become one of the most respected U.S. agencies.” [Project 2025, accessed [05/09/24](#)]

A 2020 Associated Press Analysis Found That Many VA Accomplishments Touted By Trump Had “Started During The Obama Administration” And That “Major Veterans’ Organizations In Fact Urged Trump [...] To Reappoint Obama’s Va Secretary, Bob Mcdonald, So He Could Continue The VA Gains.” “Trump frequently points to VA accomplishments such as improved wait times and the offering of same-day mental health services. But those same-day services at VA were started during the Obama administration. Major veterans’ organizations in fact urged Trump when he became president to reappoint Obama’s VA secretary, Bob McDonald, so he could continue the VA gains. Trump ultimately settled on one of McDonald’s

deputies, David Shulkin, to be VA secretary. A 2019 study by the Journal of the American Medical Association later found improved wait times at VA from 2014 to 2017, a period largely covering the Obama administration, with VA patient satisfaction also on the rise.” [Associated Press, [09/23/20](#)]

- **The AP Found That “Trump’s Claim Of Deserving All Credit For Turning The VA From A ‘Horror Show’ To ‘High Approval’ Is Sorely Misplaced.”**“While the VA has shown good ratings during the Trump administration, Trump’s claim of deserving all credit for turning the VA from a ‘horror show’ to ‘HIGH APPROVAL’ is sorely misplaced.” [Associated Press, [09/23/20](#)]

Tucker’s Chapter Complained That The Biden VA “Harbor A Bias Toward Expanding The Unionized Federal Employee Workforce” And That It “Is Focusing Very Publicly On ‘Social Equity And Inclusion.’”

Tucker’s Chapter Complained That Biden VA Appointees “Harbor A Bias Toward Expanding The Unionized Federal Employee Workforce That Has Not Always Been Aligned With A Focus On ‘veteran-Centric’ Care.” “The current VA leadership team of Biden appointees has adopted some of their predecessors’ governance processes. However, they have not sustained the previous Administration’s commitment to a genuine ‘Veteran-centric’ philosophy, most notably with respect to the delivery of health care, and harbor a bias toward expanding the unionized federal employee workforce that has not always been aligned with a focus on ‘Veteran-centric’ care.” [Project 2025, accessed [05/09/24](#)]

Tucker’s Chapter Complains That The Biden VA “Is Focusing Very Publicly On ‘Social Equity And Inclusion’ Within Departmental Policy Discussions Toward Ends That Will Affect Only A Small Minority Of The Veterans Who Use The Va.” “Additionally, the current VA leadership is focusing very publicly on ‘social equity and inclusion’ within departmental policy discussions toward ends that will affect only a small minority of the veterans who use the VA.” [Project 2025, accessed [05/09/24](#)]

Tucker’s Chapter Called On The VA To Rescind Policies Allowing Abortion Services—Which The Biden Administration Enacted In Response To Post-Roe State Abortion Restrictions—With Tucker Calling The Policies Part Of “The Grotesque Culture Of Violence Against The Child In The Womb.”

Tucker’s Chapter Complained That “For The First Time, The VA Is Allowing Access To Abortion Services,” Claiming The Department “Lacks The Legal Authority And Clinical Proficiency To Perform” Abortions. “For the first time, the VA is allowing access to abortion services, a medical procedure unrelated to military service that the VA lacks the legal authority and clinical proficiency to perform.” [Project 2025, accessed [05/09/24](#)]

Tucker Called The VA Policy On Abortions A Continuation Of “The Grotesque Culture Of Violence Against The Child In The Womb” And Part Of “Ideological Indoctrinations” From The Biden Administration. “In addition to continuing the grotesque culture of violence against the child in the womb, these sociopolitical initiatives and ideological indoctrinations distract from the department’s core missions.” [Project 2025, accessed [05/09/24](#)]

Tucker’s Chapter Called On The VA To Rescind All Policies Related To Abortion Services And Gender Reassignment Surgery, Claiming Such Policies “Follow The Left’s Pernicious Trend Of Abusing The Role Of Government To Further Its Own Agenda.” “Rescind all departmental clinical policy directives that are contrary to principles of conservative governance starting with abortion services and gender reassignment surgery. Neither aligns with service-connected conditions that would warrant VA’s providing this type of clinical care, and both follow the Left’s pernicious trend of abusing the role of government to further its own agenda.” [Project 2025, accessed [05/09/24](#)]

September 2022: In Response To State Abortion Restrictions Following The Reversal Of Roe V. Wade, The Biden VA Issued A Rule Expanding Some Abortion Services To Veterans. “The Senate rejected a Republican effort on Wednesday to reverse a Department of Veterans Affairs policy that has expanded some abortion services to veterans, a victory for President Joe Biden and Democrats who say the services are necessary medical care. [...] The Sept. 2022 rule was put in place as Democrats have tried to find ways to maintain abortion access after the Supreme Court last year overturned the Roe v. Wade ruling that guaranteed the right to an abortion. The Biden administration says the rule is in direct response to new restrictions on abortion in some states that are ‘creating serious risks to the life and health of our Nation’s veterans.’” [Associated Press, [04/19/23](#)]

- **The VA Policy Would Allow Abortion Counseling And Abortion Procedures In Cases Where The Life Or Health Of The Parent Were Endangered, Or In Cases Of Rape Or Incest.** “The policy would allow the VA to provide access to abortion counseling and also some abortions if the life or health of the parent would be endangered if the pregnancy were carried to term. The rule, which applies regardless of state laws, would also allow abortion access in the case of rape or incest.” [Associated Press, [04/19/23](#)]

Dustin Carmack, Who Authored Project 2025’s Chapter On The Intelligence Community, Is A Director Of Public Policy For Meta Platforms, Focusing On 19 States In The Southern And Southeastern U.S.

Dustin Carmack, Who Authored Project 2025’s Chapter On The Intelligence Community, Is A Director Of Public Policy For Meta Platforms, Focusing On 19 States In The Southern And Southeastern U.S.—Meanwhile, Meta Has Been Lobbying The Director Of National Intelligence On Trade And International Affairs.

Dustin J. Carmack, Who Authored Project 2025’s Chapter On The Intelligence Community, Is A Director Of Public Policy For Meta, Focusing On “19 States In The Southern & Southeastern U.S.” “Dustin J. Carmack is Research Fellow for Cybersecurity, Intelligence, and Emerging Technologies in the Border Security and Immigration Center at The Heritage Foundation. Previously, he served in the Intelligence Community as Chief of Staff to the Director of National Intelligence, John Ratcliffe. In Congress, he served as Chief of Staff to Congressman John Ratcliffe (TX-04) and Congressman Ron DeSantis (FL-06). Mr. Carmack studied at Truman State University in Missouri and Tel Aviv University in Israel.” [Project 2025, accessed [05/09/24](#)]

**INTELLIGENCE
COMMUNITY
Dustin J. Carmack**

[Project 2025, accessed [05/09/24](#)]

Experience



Director, Public Policy, Southern and Southeastern U.S.

Meta · Full-time

Apr 2024 - Present · 2 mos

Washington, District of Columbia, United States · On-site

Lead a team responsible for Meta's State policy outreach in 19 states in the Southern & Southeastern U.S.

[[Linkedin Profile for Dustin Carmack](#), accessed [05/09/24](#)]



[[Linkedin Profile for Dustin Carmack](#), accessed [05/09/24](#)]

Carmack Was Previously Policy Director For Florida Gov. Ron DeSantis' Presidential Campaign And Was Chief Of Staff And Legislative Director For DeSantis From December 2014 To May 2018. "Gov. Ron DeSantis of Florida plans to install his former congressional chief of staff as a senior adviser specializing in national security when he formally begins his presidential campaign, according to three people briefed on the plans. Dustin Carmack served as a key aide to Mr. DeSantis, whose tenure in the House lasted from 2013 until 2018, and he was chief of staff for the director of national intelligence during the Trump administration." [The New York Times, [03/30/23](#)]



Policy Director & Senior Advisor

Ron DeSantis for President

May 2023 - May 2024 · 1 yr 1 mo

[...]



U.S. House of Representatives

Full-time · 6 yrs 8 mos

Washington, District of Columbia, United States

- **Chief Of Staff to Congressman John Ratcliffe (TX-04)**
May 2018 - May 2020 · 2 yrs 1 mo
- **Chief of Staff to Congressman Ron DeSantis (R-FL)**
Jan 2015 - May 2018 · 3 yrs 5 mos
- **Legislative Director to Congressman Ron DeSantis (R-FL)**
Oct 2013 - Dec 2014 · 1 yr 3 mos

[Linkedin Profile for Dustin Carmack, accessed [05/09/24](#)]

Meta Has Lobbied Congress, The Director Of National Intelligence, The White House, And Executive Branch Agencies On Trade And International Affairs:

Discussions regarding free trade agreements;
Data localization and cross-border trade flows;
Trade promotion authority and digital trade;
Commerce export regulations - emerging technology;
EU/US data flow (Schrems II);
China;
Intermediary liability;
US-India trade negotiations

17. House(s) of Congress and Federal agencies Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES, Commerce - Dept of (DOC), State - Dept of (DOS), White House Office, U.S. Trade Representative (USTR), Federal Trade Commission (FTC), Justice - Dept of (DOJ),
Director of National Intelligence (ODNI)

[U.S. Senate Lobbying Disclosure Act Database, [04/22/24](#)]

Trump Criticized Meta For “Retribution” After It Suspended His Accounts Following The Jan. 6 Insurrection, Citing His Risk Of Inciting More Violence. “Just over two years after Donald J. Trump’s accounts were suspended from Facebook and Instagram, Meta, the owner of the platforms, said on Wednesday that it would reinstate the former president’s access to the social media services. [...] Meta suspended Mr. Trump from its platforms on Jan. 7, 2021, the day after hundreds of people stormed the Capitol in his name, saying his posts ran the risk of inciting more violence.” [The New York Times, [01/25/23](#)]

- **After Trump’s Accounts Were Restored In 2023, He Said, “A ‘Deplatforming’ Should ‘never Again Happen To A Sitting President, Or Anybody Else Who Is Not Deserving Retribution!’”** “In a post on the right-wing social network Truth Social, Mr. Trump said a ‘deplatforming’ should ‘never again happen to a sitting President, or anybody else who is not deserving retribution!’” [The New York Times, [01/25/23](#)]