

October 8, 2018

Hon. Steve A. Linick
Inspector General
U.S. Department of State
Office of Inspector General
P.O. Box 9778
Arlington, VA 22219

Re: Request for Investigation of Ambassador Nikki R. Haley's Acceptance of Flights
on Private Aircraft

Dear Inspector General Linick:

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the Office of Inspector General investigate whether Ambassador Nikki R. Haley, United States Permanent Representative to the United Nations, complied with executive branch regulations restricting gifts from sources outside the government and the ethical values set forth in those regulations.

According to her public financial disclosure report, in 2017 Ambassador Haley and her husband accepted seven free flights on luxury private aircraft from three South Carolina businessmen. The total value of those flights is not known, but CREW estimates they were worth tens of thousands of dollars to Ambassador Haley.

Federal ethics regulations prohibit employees from soliciting or accepting gifts given because of the employee's official position. They also direct employees to consider declining otherwise permissible gifts if they believe a reasonable person would question their integrity or impartiality as a result of accepting the gifts. Ambassador Haley asserted that each flight qualified for an exception to the rules for gifts based on personal relationships with the donors. It is not clear, however, that the personal relationship exception applied to these gifts. As discussed below, the exception was inapplicable if the businesses of the individuals Ambassador Haley has identified as the donors covered any part of the cost of the flights or if her relationships with those individuals were professional or political, rather than personal, in nature. In any event, whether or not the exception applied, it appears Ambassador Haley failed to live up to the ethical values expressed in the regulations.

Flights Accepted by Ambassador Haley

On May 15, 2018, Ambassador Haley filed her annual public financial disclosure report for calendar year 2017.¹ In that report, she disclosed her acceptance of gifts of seven free flights

¹ Nikki R. Haley, Public Financial Disclosure Report, May 15, 2018 ("Haley OGE 278e"), <https://bit.ly/2xRXXpG>.

on private aircraft from three South Carolina businessmen for herself and her husband.² Those flights were between New York, Washington, DC, and three cities in her home state of South Carolina (Greenville, Charleston, and Aiken).³

Prohibition on Accepting Gifts from Outside Sources

Under federal ethics regulations, employees may not “directly or indirectly . . . [a]ccept a gift from a prohibited source” or “[a]ccept a gift given because of the employee’s official position,” unless the gift qualifies for an exception to the rule.⁴ One exception permits an employee to accept a gift “under circumstances which make it clear that the gift is motivated by a family relationship or personal friendship rather than the position of the employee.”⁵ Relevant factors in making that determination “include the history and nature of the relationship and whether the family member or friend personally pays for the gift.”⁶

In her financial disclosure report, Ambassador Haley asserted that each gifted flight qualified for the personal relationship exception.⁷ Yet the report does not provide enough information to demonstrate that this exception was applicable to the flights. Whether it applies depends partly on whether the three businessmen were the only sources of the gifts; if business entities were sources of the gifts, the exception was inapplicable.⁸ The exception’s applicability also depends on the nature of the donors’ relationships with Ambassador Haley.⁹

Ambassador Haley identifies the chief executive officer of Gibbs International Inc., Jimmy Gibbs, as the source of four of the gifted flights.¹⁰ She acknowledges in her financial disclosure report, however, that the aircraft belonged to Mr. Gibbs’ company, but suggests Mr. Gibbs repaid the company for use of its plane.¹¹ Ambassador Haley does not indicate how much Mr. Gibbs paid or how she verified the repayment.¹² A clue to how much Mr. Gibbs repaid the company may be Ambassador Haley’s own valuation of the flights in her financial disclosure report, in which she asserts that the total value of the four flights she and her husband accepted was only \$1,754, an amount Ambassador Haley indicates she calculated based on the price of first-class airfare on a commercial airline.¹³

² *Id.*, Part 9.

³ *Id.*

⁴ See 5 C.F.R. § 2635.202(b).

⁵ 5 C.F.R. § 2635.204(b)

⁶ *Id.*

⁷ Haley OGE 278e, Part 9.

⁸ See 5 C.F.R. § 2635.204(b) (authorizing under certain circumstance the acceptance of a gift from an “individual,” as opposed to an organization); see also Example 2 to 5 C.F.R. § 2635.204(b) (illustrating that the exception does not cover a gift paid for by an individual’s employer); Office of Gov’t Ethics, Adv. Op. 06 x 7, 20 (2006) (“Relevant factors include the history of the relationship and whether the gift was actually paid for by the friend (as opposed to, for example, the contractor who employs the friend).”).

⁹ See 5 C.F.R. § 2635.204(b).

¹⁰ Haley OGE Form 278e, Part 9, Lines 3 and 4.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

If Mr. Gibbs repaid only \$1,754 for use of the company aircraft, however, his repayment likely fell far short of the costs Gibbs International Inc. incurred to transport Ambassador Haley and her husband. Based on Federal Aviation Administration (“FAA”) records and commercial data regarding the costs of operating aircraft, CREW estimates that the total cost to the company for the four flights was approximately \$24,000.¹⁴ If Ambassador Haley and her husband were the only passengers on these flights, the entire \$24,000 would be attributable to her. If Mr. Gibbs flew with them on all four flights, something Ambassador Haley does not explicitly claim in her report, approximately \$14,672 would be attributable to her.¹⁵ Even if both Mr. Gibbs and another passenger accompanied them, approximately \$10,709 would be attributable to Ambassador Haley.¹⁶ Unless Mr. Gibbs reimbursed the company for all the operating expenses attributable to Ambassador Haley and her husband, as well as any other expenses the company incurred in connection with transporting them, the company was a source of at least a significant portion of the gift. In that event, the personal relationship exception was inapplicable.

Like Mr. Gibbs, the other two donors of flights, Smyth McKissick and Mikee Johnson, were chief executive officers of private companies in South Carolina in 2017.¹⁷ Ambassador Haley does not indicate in her financial disclosure report whether their companies either owned or leased the aircraft on which she flew. In her report, Ambassador Haley values the cost of the flight associated with Mr. McKissick as worth only \$704 and the cost of the two flights associated with Mr. Johnson as worth only \$761.¹⁸ The operating costs of private aircraft for

¹⁴ FAA records appear to indicate the aircraft used was a Gulfstream G400. See FAA Registry, Reg. No. N527JG, <https://bit.ly/2CuwrD5>. A conservative estimate for the cost to operate that type of aircraft has been reported as \$12.70 per mile. See Liberty Jet, *Gulfstream G400 Operating Costs*, Big Rig Media, LLC, <https://bit.ly/2O60Mt9> (last viewed Sept. 17, 2018) (indicating a range of \$12.70 to \$16.25 per mile, depending on usage). CREW estimates the total distance flown was 1910 miles: (1) Greenville, SC (GSP) to New York, NY (LGA) (610 miles); (2) New York, NY (LGA) to Charleston, SC (CHS) (642 miles); (3) Charleston, SC (CHS) to Washington, DC (DCA) (444 miles); and (4) Washington, DC (DCA) to New York, NY (LGA) (214 miles). See Planemasters, Ltd., *Flight Calculator*, <https://bit.ly/2MrF5IP>. Nautical miles converted to miles by multiplying by 1.1508. See National Ocean Service, National Oceanic and Atmospheric Administration, U.S. Department of Commerce, *What is the difference between a nautical mile and a knot?*, <https://bit.ly/2zM7xf4> (last viewed Oct. 2, 2018).

¹⁵ If Mr. Gibbs accompanied them, the allocation is based on the following assumptions: (1) two-thirds allocation for Greenville, SC to New York, NY (Amb. Haley and her husband) (610 miles \times \$12.70 \times 0.66 = \$5,113); (2) two-thirds allocation for New York, NY to Charleston, SC (Amb. Haley and her husband) (642 miles \times \$12.70 \times 0.66 = \$5,381); (3) one-half allocation for Charleston, SC to Washington, DC (Amb. Haley’s husband) (444 miles \times \$12.70 \times 0.5 = \$2,819); and (4) one-half allocation for Washington, DC to New York, NY (Amb. Haley) (214 miles \times \$12.70 \times 0.5 = \$1,359).

¹⁶ If Mr. Gibbs and another person accompanied them, the allocation is based on the following assumptions: (1) one-half allocation for Greenville, SC to New York, NY (Amb. Haley and her husband) (610 miles \times \$12.70 \times 0.5 = \$3,874); (2) one-half allocation for New York, NY to Charleston, SC (Amb. Haley and her husband) (642 miles \times \$12.70 \times 0.5 = \$4,077); (3) one-third allocation for Charleston, SC to Washington, DC (Amb. Haley’s husband) (444 miles \times \$12.70 \times 0.33 = \$1,861); and (4) one-third allocation for Washington, DC to New York, NY (Amb. Haley) (214 miles \times \$12.70 \times 0.33 = \$897).

¹⁷ See *Company Overview, Alice Manufacturing Company, Executive Profile, E. Smyth McKissick III*, Bloomberg, <https://bloom.bg/2NQ23HZ> (naming Mr. McKissick as CEO and President); Jamie Self, *This SC Magnate is funneling cash to Gov. McMaster’s challenger*, *The State*, July 12, 2017, <https://bit.ly/2DwFVOL> (naming Mr. Johnson as CEO of Cox Industries).

¹⁸ Haley OGE 278e, Part 9, Lines 2 and 5.

these flights, however, were almost certainly greater than those amounts.¹⁹ As with the flights Mr. Gibbs supplied, the personal relationship exception was inapplicable if Ambassador Haley flew on company aircraft without full reimbursement of the company by the individual donors.

Even if the three businessmen were, indeed, the only sources of the gifts, the State Department's ethics officials had the responsibility to carefully review the nature of the relationships involved to ensure they were genuine personal relationships. If a relationship with a donor is partly political or professional in nature, the employee must meet a high burden to show that the personal relationship exception is applicable.²⁰ In assessing the applicability of the personal relationship exception, the Office of Government Ethics has explained that ethics officials must consider factors such as "the length of time of the relationship, the intimacy of the relationship including any family interaction, the nature of personal activities outside the work context, and the frequency of outside contacts."²¹

In this case, Ambassador Haley's relationships with these individuals appear to have significant political and professional components. Ambassador Haley indicates that she has been friends with Mr. Gibbs for only five years,²² which means the friendship began during her tenure as governor of South Carolina.²³ Mr. Gibbs, Mr. McKissick, and Mr. Johnson all appear to have made contributions in support of her gubernatorial campaigns,²⁴ and Mr. McKissick and Mr. Johnson both volunteered to help her with political fundraising.²⁵ In addition, Mr. McKissick's company contributed \$32,000 in support of her gubernatorial campaigns, directly and through a political organization.²⁶ Mr. McKissick and Mr. Johnson also are

¹⁹ Without knowing the type of aircraft involved, it is difficult to estimate costs the companies may have incurred. However, even if the operating costs of the aircraft involved were just half the cost of operating the aircraft Mr. Gibbs' company supplied, the actual costs would have amounted to at least \$3,874 for the flight associated with Mr. McKissick and \$8,306 for the flights associated with Mr. Johnson. These costs estimates are based on the following calculations: (1) Greenville, SC to New York, NY (610 miles \times \$12.70 \times 0.5 = \$3,874); (2) New York, NY to Aiken, SC (654 miles \times \$12.70 \times 0.5 = \$4,153); and (3) Aiken, SC to New York, NY (654 miles \times \$12.70 \times 0.5 = \$4,153).

²⁰ Office of Government Ethics guidance provides that "[w]here a personal relationship develops from an on-going work relationship, it can be very difficult to clearly establish that the gift is not being given because of the employee's official position" and that, in such cases, "an employee bears a considerable burden in establishing that a gift is based on a personal relationship rather than the employee's Government position." Office of Gov't Ethics, Adv. Op. 06 x 3, 2 (2006).

²¹ *Id.*

²² See Haley OGE 278e, Part 9, Line 3.

²³ Haley Takes Oath, *The State*, Jan. 21, 2011, <https://bit.ly/2OOwSde>.

²⁴ See FollowTheMoney.org, Gibbs, James I (Jimmy) contributions to Haley, Nikki R (SC 2014), <https://bit.ly/2QvCL0o>; FollowTheMoney.org, McKissick, E. contributions to Haley, Nikki R (SC 2014), <https://bit.ly/2OJ6D7Z>; FollowTheMoney.org, Johnson, Robert Michael contributions to Haley, Nikki R (SC 2014), <https://bit.ly/2OJJnqs>. See also Center for Public Integrity, The Movement Fund, <https://bit.ly/2NOGyXT> (describing organization as "[a] nonprofit affiliated with and supporting Gov. Nikki Haley"); The Movement Fund, IRS Form 8872, Political Organization Report of Contributions and Expenditures, Second Quarter Report, July 15, 2014, at 2, <https://bit.ly/2ID4MzD> (reporting contribution from R. M. Johnson).

²⁵ Haley announces fundraisers for potential campaign, *Associated Press*, Mar. 5, 2013, <https://bit.ly/2xp7WBO>.

²⁶ See FollowTheMoney.org, Alice Manufacturing Co., <https://bit.ly/2xqzd6E>; The Movement Fund, IRS Form 8872, Political Organization Report of Contributions and Expenditures, First Quarter Report, Apr. 15, 2014, at 2, <https://bit.ly/2xUHd0T> (reporting contribution from Alice Manufacturing Co.).

connected to Ambassador Haley in a professional capacity through their service on the board of The Original Six Foundation.²⁷ Mr. Johnson also served as “Chair of the State Workforce Investment Board at the request of Governor Haley.”²⁸ These political and professional dealings are important context for evaluating Ambassador Haley’s claim that the gifts of free travel were clearly based solely on personal relationships.

Another consideration in determining whether the personal relationships were genuine is the nature of the gifts themselves. The gift of luxury air travel appears more consistent with political or professional relationships than personal ones, particularly given that Ambassador Haley’s financial disclosure report suggests she lacks the means to reciprocate with gifts of comparable value.²⁹ Therefore, one question ethics officials should have asked Ambassador Haley is whether the donors provided her with luxury air travel before she entered public service at the state or federal level. If not, it would be difficult for her to show the gifts were given “under circumstances which make it clear” that the gifts were motivated solely by personal friendships rather than her official position.³⁰ Ambassador Haley’s state filings show that, while she was governor, Mr. McKissick lent her box seats for college football games and Mr. Johnson provided her with air travel.³¹ But these filings show only that Ambassador Haley was comfortable accepting gifts from constituents while holding her state’s highest office. They do not answer the question of whether the donors felt any desire to present her with lavish gifts before she entered public service.

Though much of Ambassador Haley’s work at the United Nations may not directly affect her benefactors’ business interests, she recently published an opinion piece regarding her “very open access to the president” and the “ample opportunity” she enjoys “to try to persuade the

²⁷ See The Original Six Foundation website, Mikee Johnson, Chair; The Original Six Foundation, 2016 IRS Form 990, Part VII, Sec. A, <https://bit.ly/2xbZjuR>; Nikki R. Haley, Nominee Public Financial Disclosure Report, Nov. 28, 2016, Part 1, Line 2, <https://bloom.bg/2OjEnsn>.

²⁸ The Original Six Foundation website, Mikee Johnson, Chair; South Carolina Dep’t of Employment and Workforce, The State Workforce Development Board Board Members, <https://bit.ly/2N07XSn>.

²⁹ See Haley OGE Form 278e, Part 8 (“Liabilities”).

³⁰ See Office of Gov’t Ethics, Adv. Op. 06 x 3, 2 (2006) (“One must look to the circumstances surrounding the gift when a personal relationship is at issue.”); see also Standards of Ethical Conduct for Employees of the Executive Branch, 57 Fed. Reg. 35006, 35012 (July 23, 1992) (“By its terms, the exception at § 2635.204(b) for gifts based on a personal relationship would not apply unless the circumstances make it clear that the gift is motivated by the family relationship or personal friendship involved, and the exceptions at §§ 2635.204(e)(1) and 2635.204(e)(2) for certain gifts based on outside business and employment relationships would not apply to gifts offered or enhanced because of the employee’s official position.”).

³¹ See Nikki R. Haley, Statement of Economic Interests Report, Amendment 2, South Carolina State Ethics Comm’n, May 2, 2011, <https://tinyurl.com/y7g9j2f7>; Nikki R. Haley, Statement of Economic Interests Report, South Carolina State Ethics Comm’n, Apr. 16, 2012, <https://tinyurl.com/y8x696rj>; Nikki R. Haley, Statement of Economic Interests Report, Amendment 1, South Carolina State Ethics Comm’n, Apr. 7, 2014, <https://bit.ly/2NSqWCW>; Nikki R. Haley, Statement of Economic Interests Report, Amendment 1, South Carolina State Ethics Comm’n, Aug. 23, 2016, <https://tinyurl.com/yaslueme>; Nikki R. Haley, Statement of Economic Interests Report, South Carolina State Ethics Comm’n, Mar. 28, 2016, <https://tinyurl.com/y6vudamr>; Nikki R. Haley, Statement of Economic Interests Report, South Carolina State Ethics Comm’n, Mar. 29, 2017, <https://tinyurl.com/y745n83p>.

president to change course.”³² This inner-circle access to President Trump makes her a valuable contact for anyone affected by his administration’s policies. For example, at a time when the Trump Administration is redirecting the nation’s approach to trade policy,³³ Mr. McKissick’s company has announced the closure of a plant due to competition with textile imports and its employees have received a determination of eligibility for federal trade adjustment assistance.³⁴ The company is also a member of a trade association that opposed the administration’s contemplated withdrawal from the North American Free Trade Agreement.³⁵ For their parts, Mr. Gibbs has publicly expressed interest in the administration’s economic and trade policies,³⁶ and Mr. Johnson remains active in state politics.³⁷ All of these interests suggest the flights may have been given because of Ambassador Haley’s position and not clearly due solely to personal relationships.

Ethical Values Considered in Evaluating Propriety of Accepting Gifts

Beyond the question of her eligibility for the personal relationship exception, Ambassador Haley does not appear to have lived up to the ethical values expressed in the executive branch gift regulations:

Every employee has a fundamental responsibility to the United States and its citizens to place loyalty to the Constitution, laws, and ethical principles above private gain. An employee’s actions should promote the public’s trust that this responsibility is being met. For this reason, employees should consider declining otherwise permissible gifts if they believe that a reasonable person with knowledge of the relevant facts would question the employee’s integrity or impartiality as a result of accepting the gift.³⁸

The regulations provide a non-exclusive list of factors to consider when evaluating this standard, including whether a gift has a high value and the potential that the gift will afford the donor significantly disproportionate access to the employee.³⁹ Another relevant consideration is

³² Nikki Haley, When I challenge the president, I do it directly. My anonymous colleague should have, too, *Washington Post*, Sept. 7, 2018, <https://wapo.st/2QknUFJ>.

³³ See, e.g., Matthew Townsend, Textile Industry Shattered by China Trade Embraces Trump Crusade, *Bloomberg*, July 18, 2018, <https://bloom.bg/2xsCHWv>.

³⁴ Upstate textile plant closing will eliminate 175 jobs, *Associated Press*, Apr. 24, 2018, <https://bit.ly/2D6cpPB>; U.S. Dep’t of Labor, Notice of Determinations Regarding Eligibility to Apply for Trade Adjustment Assistance, 83 Fed. Reg. 42698 (Aug. 23, 2018).

³⁵ Rudolph Bell, Textile industry wants Trump to renegotiate NAFTA, not dump it, *Upstate Business Journal*, Feb. 10, 2017, <https://bit.ly/2NTnJCY>.

³⁶ Bob Montgomery, Upstate leaders hope Trump policies help business, *GoUpstate.com*, Dec. 7, 2016, <https://bit.ly/2QGtm5X>.

³⁷ Tom Barton, Money, money, money: How the SC candidates for governor are raking it in, *Greenville News*, June 8, 2018, <https://grnol.co/2Oyz313>; Jamie Self, How a few big donors are bankrolling the GOP race to pick your next SC governor, *Myrtle Beach Online*, Oct. 19, 2017, <https://bit.ly/2MlrEOu>.

³⁸ 5 C.F.R. § 2635.201(b)(1).

³⁹ 5 C.F.R. § 2635.201(b)(2).

the frequency with which an employee accepts gifts from the same or different sources.⁴⁰ In this instance, these factors weighed against Ambassador Haley's acceptance of seven free flights, given the high cost she would have incurred to charter luxury aircraft on her own, the disproportionate access these flights potentially afforded the donors,⁴¹ and the frequency with which she accepted free flights. These gifts should also be viewed in context of Ambassador Haley's acceptance during the same calendar year of basketball tickets she indicates were worth \$19,558.⁴² In addition, Ambassador Haley should have been conscious of the appearance concerns surrounding her acceptance of gifts of private luxury air travel at a time when her colleagues in the administration were making news with their own lavish air travel.⁴³

Conclusion

In sum, the information in Ambassador Haley's financial disclosure report is insufficient to resolve concerns about her frequent acceptance of expensive gifts in 2017. It is not clear that the personal relationship exception to the gift rules was applicable to the gifts of free travel on private luxury aircraft that Ambassador Haley accepted. If business entities were sources of these gifts, the exception was inapplicable. Even if the chief executive officers of those business entities personally bore all costs of the travel and, therefore, were the only sources of the gifts,

⁴⁰ See 5 C.F.R. § 2635.205(c); see also Office of Gov't Ethics, Adv. Op. 06 x 7, 20 (2006) ("An employee may not use any of the gift exceptions, including the *de minimis* exception, to accept gifts from the same or even different sources so frequently that a reasonable person would believe the employee is using his public office for private gain.").

⁴¹ For example, it appears likely that Ambassador Haley attended a Clemson University football game with several of the businessmen as a result of gifted flights. On November 9, 2017, Mr. McKissick flew Ambassador Haley and her husband to South Carolina, and Mr. Gibbs flew them back to New York on November 12. See Haley OGE 278e, Part 9, Lines 2 and 3. In between, on November 11, both Ambassador Haley and Mr. Gibbs attended the football game. See Jimmy Gibbs (@JGibbsIII), Twitter (Nov. 11, 2017), <https://bit.ly/2xlZp3g> (photograph and text, "Always a great day to be in the Valley!!"); Nikki Haley (@nikkihaley), Twitter (Nov. 11, 2017), <https://bit.ly/2OKXNbs>. It is not clear if Mr. McKissick also attended the game, but he was chairman of the Clemson University board of trustees and a member of the Clemson booster club called IPTAY, and the game was designated "IPTAY Day." See IPTAY (@IPTAY_), Twitter (Feb. 16, 2017), <https://bit.ly/2NULFWd>; Cathy Sams, McKissick elected chairman of Clemson University trustee board, Clemson University, July 17, 2015, <https://bit.ly/2pjzDYM>. On another occasion, Mr. Johnson, who is on the board of The Original Six Foundation, provided Ambassador Haley with transportation to South Carolina in August 2017, which appears to have facilitated her travel to an event associated with the foundation. See The Original Six Foundation website, Mikee Johnson, Chair; The Original Six Foundation, Events, <https://bit.ly/2Oi8hxc>; Nikki Haley, (@nikkihaley) Twitter (Aug. 6, 2017), <https://bit.ly/2CYkaqP>; Instagram, nikkihaley (verified user) (Aug. 7, 2017) ("In SC, we started after school programs in rural areas. Last night it was great to be back with those continuing to support those efforts. Every child regardless of their circumstances needs to know they are meant for great things. #Original6"), <https://bit.ly/2p85UST> (last viewed Sept. 14, 2018); Haley OGE Form 278e, Part 9, Line 5.

⁴² Haley OGE Form 278e, Part 9, Line 1.

⁴³ See, e.g., Drew Harwell and Lisa Rein, Zinke took \$12,000 charter flight home in oil executive's plane, documents show, *Washington Post*, Sept. 28, 2017, <https://wapo.st/2OjskeP>; Kevin Liptak and Miranda Green, Price out as HHS secretary after private plane scandal, *CNN*, Sept. 29, 2017, <https://cnn.it/2M3jJjf>; Aaron Blake, The Trump administration's private plane problem, *Washington Post*, Sept. 20, 2017, <https://wapo.st/2xakEVE>; Julia Horowitz, The 7 trips Steven Mnuchin took on government planes for \$811,800, *CNN*, Oct. 6, 2017, <https://cnnmon.ie/2xdLDip>; Jen Kirby, The Veteran Affairs secretary's Euro trip scandal, explained, *Vox*, Feb. 14, 2018, <https://bit.ly/2MpgXAc>; Dan Mangan, EPA chief Scott Pruitt took first-class, military, charter flights that cost taxpayers more than \$163,000 in first year alone: Report, *CNBC*, Mar. 21, 2018, <https://cnb.cx/2FTDN4m>.

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the professional and political nature of their relationships with Ambassador Haley may not support a finding that the gifts were clearly offered solely based on personal relationships. As a result, CREW respectfully requests that you investigate whether the gifts she accepted were ineligible for the personal relationship exception.

Furthermore, even if the relationships were purely personal and of such a nature that the reciprocal exchange of expensive gifts was routine, Ambassador Haley and the State Department's ethics office do not appear to be living up to the values-based ethical standard set forth at 5 C.F.R. § 2635.201(b) for declining otherwise permissible gifts. Therefore, we also request that you determine whether the State Department's ethics office is adequately training employees like Ambassador Haley on the application of ethical standards.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Noah Bookbinder', is written in a cursive style.

Noah Bookbinder
Executive Director

cc: Emory A. Rounds, Director, U.S. Office of Government Ethics