BRUCE WESTERMAN OF ARKANSAS
CHAIRMAN

VIVIAN MOEGLEIN
STAFF DIRECTOR

JARED HUFFMAN OF CALIFORNIA
RANKING DEMOCRAT

ANA UNRUH COHEN
DEMOCRATIC STAFF DIRECTOR

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

August 21, 2026

Jessica Bowron
Acting Director
U.S. National Park Service
1849 C Street NW
Washington, D.C. 20240

Dear Ms. Bowron:

We are writing to express concern regarding the National Park Service's apparent noncompliance with agency policy governing fundraising for the proposed White House Ballroom. We request a briefing from NPS on the project fundraising agreements and donor vetting procedures for the Ballroom. Pursuant to Rule X of the Rules of the House of Representatives, the Committee on Natural Resources has broad jurisdiction over public lands, the National Park Service, parks within the District of Columbia, and monuments erected therein, including President's Park and the White House.

Since last year, the President has solicited private donations from corporations and the ultrawealthy in an attempt to avoid oversight of the White House Ballroom project.[1] Despite efforts from Congress and government watchdogs, key details regarding the fundraising, donors, and terms of donations remain undisclosed.[2] Many of the publicly listed donors have financial or business interests before the federal government; some are even involved in active litigation against the federal government.[3] This administration's repeated attempts to avoid transparency around the solicitation of private donations to fund another vanity project are especially concerning given the number of donors with financial or business interests before the federal government.

On April 22, 2026, the terms under which NPS has delegated fundraising authority to the Trust for the National Mall (TNM) were made public after their release was compelled by a federal judge.[4] The released Philanthropic Support Agreement between the Executive Residence at the White House (EXR), NPS, and TNM establishes the fundraising and donor vetting structure for the Ballroom project. Aspects of the Philanthropic Support Agreement diverge from core tenets of NPS internal policies governing private philanthropy and donor vetting, including NPS Director's Order 21 which governs Donations and Philanthropic Partnerships, and Reference Manual 21,

[1] Portnoy, Steven. ABC News. *White House ballroom: Judge signals skepticism of Trump administration arguments.* January 23, 2026. https://abcnews.com/Politics/white-house-ballroom-judge-signals-skepticism-trump-administration/story?id=129471562
[2] Diamond, Dan; Schaffer, Aaron; and Edwards, Jonathan. The Washington Post. *Legality of Trump's $400M in private funding for White House ballroom at issue.* February 9, 2026. https://www.washingtonpost.com/politics/2026/02/09/trump-ballroom-judge-ruling/
[3] Public Citizen. *Banquet of Greed: Trump Ballroom Donors Feast on Federal Funds and Favors.* November 3, 2025. https://www.citizen.org/article/banquet-of-greed-trump-ballroom-donors-feast-on-federal-funds-and-favors/
[4] Public Citizen. *Trump Administration Finally Discloses White House Ballroom Funding Contract in Response to Public Citizen's FOIA Lawsuit.* April 22, 2026. https://www.citizen.org/news/trump-administration-finally-discloses-white-house-ballroom-funding-contract-in-response-to-public-citizens-foia-lawsuit/

Chapter 5. The fundraising structure raises concerns about potential favorable treatment from the federal government and has prompted significant concern from government ethics experts.[5,6]

NPS has a long history of leveraging private philanthropy to support the National Park System.[7,8] Indeed, as Director's Order 21 acknowledges, "a number of national parks exist because motivated citizens contributed their time, talent, and funds to create them."[9] Philanthropy has supported countless improvements and capital projects that have made existing park sites better. Federal funding shortfalls have necessitated private funding sources for our parks. But philanthropy has only succeeded because of the guardrails that protect the agency's integrity. Director's Order 21 and Reference Manual 21, Chapter 5 detail the agency's internal policies governing philanthropy in the parks, which exist to guide NPS staff and ensure that agency actions "maintain the integrity and impartiality of, and public confidence in, the NPS and the Department of the Interior (DOI)."[10] The opaque fundraising scheme employed for the White House Ballroom necessitates congressional oversight and may require legislative reform to strengthen philanthropic guardrails and protect our parks.

White House Ballroom Philanthropic Support Agreement

The Philanthropic Support Agreement between EXR, NPS, and TNM appears to flout NPS policies surrounding philanthropy. NPS Director's Order 21 requires Philanthropic Support Agreements such as the one governing fundraising for the White House Ballroom for short-term projects with third-party fundraising expected to raise over $25,000.[11] The Philanthropic Support Agreement for the White House Ballroom establishes that EXR is tasked with identifying potential donors, connecting them with TNM, and communicating whether a potential donor intends to maintain anonymity.[12] TNM is in turn authorized by NPS to vet and accept all donations for the purposes of the project. Once donations have been made and a written request is received, the agreement dictates that donated funds will be transferred from TNM to NPS accounts.

The Philanthropic Support Agreement deviates considerably from NPS policy and the agency's template Partnership Support Agreement.[13] Unlike the template agreement, the agreement governing fundraising for the White House Ballroom: 1) outsources all donor vetting to the third-party partner, 2) adds numerous provisions that attempt to preserve donor anonymity, 3) sidesteps requirements for an annual work plan and feasibility studies, 4) removes a partner audit requirement for fundraising over $1 million, 5) attempts to avoid scrutiny and audit by the NPS

---

[5] Kanno-Youngs, Zolan. The New York Times. *Trump Hosts Dinner for Wealthy Donors to White House Ballroom*. October 15, 2025. https://www.nytimes.com/2025/10/15/us/politics/trump-white-house-dinner-ballroom-donors.html

[6] Lotz, Avery. Axios. *Ethics experts cringe as wealthy woo Trump with ballroom funds*. October 16, 2025. https://www.axios.com/2025/10/16/trump-white-house-ballroom-ethics-donors

[7] National Park Service. *Creation of Grand Teton National Park (A Thumbnail History).* January 2000. https://www.nps.gov/grte/planyourvisit/upload/creation.pdf

[8] National Park Service. *Acadia National Park – Founding Acadia.* Updated December 21, 2023. https://www.nps.gov/acad/learn/historyculture/founding.htm

[9] National Park Service. *Director's Order #21: Donations and Philanthropic Partnerships, as amended by Memoranda dated August 31, 2020, May 18 and December 5, 2023, November 21, 2024, and March 3, 2025.* https://www.nps.gov/subjects/policy/upload/DO_21_12-28-2016.pdf

[10] *Id.*

[11] *Id.*

[12] Philanthropic Support Agreement Between the National Park Service, the White House and President's Park, and the Executive Residence at the White House, Executive Office of the President and the Trust for the National Mall. https://www.citizen.org/wp-content/uploads/White-House-Ballroom-Funding-Agreement.pdf

[13] National Park Service. *Philanthropic Support Agreement Template.* https://www.nps.gov/subjects/partnerships/upload/PHILANTHROPIC-SUPPORT-AGREEMENT-Template-to-use-508.docx

Comptroller and DOI Office of Inspector General, and 6) allows for donations from alcohol and tobacco companies which is generally prohibited in NPS-authorized fundraising.

Donor Vetting Protocol

Director's Order 21 requires that partners consider all relevant factors when determining whether to accept or decline a donation to benefit the NPS, including the donor type, financial interest, and purpose of the donation. The Order states that the partner "should weigh the totality of the circumstances from the perspective of a reasonable person with knowledge of the relevant facts."[14] NPS provides partner groups with guidance including a donor review and decision worksheet that details donor evaluation criteria.[15] Those evaluation factors include whether the donation could affect the perceived integrity of NPS and DOI, impartiality and the appearance of impartiality, and public confidence. This means that donations must not be an attempt to influence the exercise of any regulatory or other authority, must be consistent with law and policy, must not involve an actual or implied commitment to take action favorable to the donor, must not allow the donor to obtain or appear to obtain special treatment, and must not be likely to result in public controversy.[16]

Additionally, NPS Reference Manual 21, Chapter 5 provides donor vetting thresholds for both direct and indirect donations. Under these policies, official philanthropic partners will review all donations under $500,000. Donations above that threshold should be reviewed and approved at the NPS Assistant Director of Partnerships and Civic Engagement level. The Reference Manual notes that "when these indirect donations are valued in excess of $500,000, NPS is required to vet the potential donation through its own donor review process."[17] The Reference Manual notes that while each partnership group may have different capacity to vet donations, certain key features must be present within the review process.

Chapter 5.4 of the Reference Manual provides guidance to partner organizations about vetting donations.[18] Most nonprofit partners have their own professional standards for vetting and accepting donations, typically described in a gift acceptance policy. The philanthropic partner's donor review process must be set out in the gift acceptance policy section of the philanthropic agreement between the NPS and the partner. Notably, the agreement between EXR, NPS, and TNM excludes a gift acceptance policy section.

NPS Reference Manual 21 Chapter 5.5 further dictates that donations from parties involved in litigation against the federal government "may be seen as an attempt to influence the handling or outcome of legal disputes or litigation. Therefore, the NPS will decline any gifts or donations that appear to do so."[19] Though it allows for exceptions, the Reference Manual clearly guides NPS and its philanthropic partners to exercise caution when accepting any donation from parties involved in litigation against the federal government. NPS advises that the agency will normally decline a gift from a donor involved in litigation with the Department or its bureaus to avoid any appearance that the donation may influence the legal dispute. Philanthropic partners agree to make reasonable efforts to determine if donors are involved in litigation or have business interests before the NPS

---

[14] National Park Service. *Director's Order #21: Donations and Philanthropic Partnerships, as amended by Memoranda dated August 31, 2020, May 18 and December 5, 2023, November 21, 2024, and March 3, 2025.* https://www.nps.gov/subjects/policy/upload/DO_21_12-28-2016.pdf
[15] National Park Service. *Donor Review Decision Worksheet.* https://www.nps.gov/subjects/partnerships/upload/Tool-Donor-Review-Decision-Worksheet-508.docx
[16] National Park Service. *Director's Order #21: Donations and Philanthropic Partnerships, as amended by Memoranda dated August 31, 2020, May 18 and December 5, 2023, November 21, 2024, and March 3, 2025.* https://www.nps.gov/subjects/policy/upload/DO_21_12-28-2016.pdf
[17] National Park Service. *Reference Manual 21 – Chapter 5.* https://www.nps.gov/subjects/partnerships/rm-21-chapter-5.htm
[18] *Id.*
[19] *Id.*

or DOI to avoid the appearance of apparent or actual conflicts of interest. While NPS policy requires vetting for potential donors to identify if they are involved in litigation against or are seeking business deals with NPS or the DOI, it does not require this vetting for any other Executive Branch department or agency outside of the DOI. Under normal circumstances, limiting vetting to DOI engagement may be sufficient. But because these donations will go toward a specific White House pet project, the White House is directly involved in the fundraising efforts, and the President himself is soliciting donations, the scope of vetting should be broader than just the Interior Department. Without a fulsome review of all potential conflicts, litigation, or other business before the federal government, this Ballroom Agreement provides an opening for entities heavily engaged with and regulated by the federal government to curry favor with the head of the Executive Branch without a full review of all potential conflicts of interest.

The Philanthropic Support Agreement spells out that "notwithstanding Sections 5.1 and 5.4 of DO 21, the Partner [TNM] is responsible for vetting all indirect donations irrespective of amount." Despite these guidelines, under the White House Ballroom Philanthropic Support Agreement, TNM is tasked with all donor vetting associated with the project and allows for clear exceptions to NPS guidance and policy. This agreement deprives NPS of authority to vet donations for the White House Ballroom, despite longstanding policy requiring agency donor review. In practice, this $600 million project will lack appropriate federal oversight to identify conflicts of interest through the donor vetting process.

Anonymity

Under the Philanthropic Support Agreement for the Ballroom, EXR is tasked with donor recruitment and referral to the fundraising partner, TNM. Donors are permitted to request anonymity, but the structure established in the agreement is abnormal because the recruitment process may result in donor anonymity to the entity charged with vetting, but not to the White House donor recruitment personnel. This creates an inherent risk of conflict of interest because EXR is aware of the identity of prospective donors, even if those donors go on to donate anonymously. The agreement allows anonymous donors to claim anonymity to the entity tasked with vetting them for conflicts, as well as from the broader public; however, these donors are notably *not* anonymous to the White House from whom they may be seeking favor.

Compounding this inherent conflict, NPS donor vetting protocols allow for anonymous donors to bypass a fulsome vetting process. Reference Manual 21 indicates that "anonymous donations or donations made to partners to support their general administrative/operational needs or for partner programs and projects that do not involve NPS are not subject to NPS donor review policies."[20] Under this provision, anonymous donations are not subject to a full donor review process, which in this case opens the door to potential conflicts of interest and even foreign influence.

Attachment A subsection (B) of the Philanthropic Support Agreement bars donations from foreign nationals or other foreign entities. However, subsection (C) of the agreement states that "notwithstanding subsection (B), the Parties will preserve the anonymity and privacy of any donor

[20] *Id.*

who wishes to remain anonymous."[21] The agreement therefore appears to create a backdoor for foreign entities to evade donate without meaningful review by simply by requesting anonymity.

Annual Work Plan and Feasibility Studies

The Philanthropic Support Agreement runs counter to NPS policy and standard practice in preparing an Annual Work Plan and Feasibility Studies. NPS's template for creating a Philanthropic Support Agreement requires project feasibility studies for philanthropic agreements with projects at or above $1 million or that "may attract public scrutiny or controversy."[22] Feasibility studies allow NPS and partner organizations to assess the chance of success for a fundraising campaign. While NPS or the partner may request an exemption to this requirement, the White House Ballroom project would land squarely within the requirements for such a study. Despite this, the agreement lacks a feasibility study.

The template also requires an Annual Work Plan, which approves annual work associated with a project for each year that the agreement is active. An Annual Work Plan lays out the specific responsibilities of the philanthropic partner and helps to align the identified park need with the partner's plan for specific fundraising activities. The Plan should address fundraising, sponsorship, marketing, donor cultivation, and any events to solicit or accept donations. No Annual Work Plan is mentioned in the Philanthropic Support Agreement.

Ordinarily, Annual Work Plans and Feasibility Studies would be submitted as attachments to the Philanthropic Support Agreement. They did not appear in the Ballroom Agreement as released.

Threshold for Audit and Office of Inspector General Review

NPS's template for Philanthropic Support Agreements includes rights of inspection and audit for the NPS Comptroller and DOI Inspector General to verify and audit third-party records executed in connection with an agreement with NPS.[23] The template mandates that "in any given year where a Partner raises between $1 million or more for the benefit of the NPS, they will undertake a financial audit and furnish a copy to the NPS." The partner agrees to take corrective action based on the findings of the review.[24] The Philanthropic Support Agreement between EXR, NPS, and TNM excludes this provision as well as provisions regarding NPS Comptroller and DOI Office of Inspector General review authority. Though the DOI Office of Inspector General's statutory authority still covers an agreement like this, the removal of these provisions is notable in a project that has clearly made efforts to sidestep transparency and oversight.

Tobacco Companies

Reference Manual 21 Chapter 5.1.1 requires that NPS decline direct donations from certain entities including "sources that would identify the NPS with tobacco or any illegal products."[25] NPS has historically tried to avoid donations that could appear as an NPS endorsement of products that are inconsistent with the agency's mission or could undermine public trust. Director's Order 21

---

[21] Philanthropic Support Agreement Between the National Park Service, the White House and President's Park, and the Executive Residence at the White House, Executive Office of the President and the Trust for the National Mall. https://www.citizen.org/wp-content/uploads/White-House-Ballroom-Funding-Agreement.pdf

[22] National Park Service. *Philanthropic Support Agreement Template.* https://www.nps.gov/subjects/partnerships/upload/PHILANTHROPIC-SUPPORT-AGREEMENT-Template-to-use-508.docx

[23] *Id.*

[24] *Id.*

[25] National Park Service. *Reference Manual 21 – Chapter 5.* https://www.nps.gov/subjects/partnerships/rm-21-chapter-5.htm#CP_JUMP_5987632

reiterates this principle, indicating that fundraising that identifies the NPS with tobacco or any type of illegal product will not be authorized for any NPS-authorized philanthropic activities and efforts.[26] Public health groups have requested that the agency continue those prohibitions and avoid philanthropic partnerships with alcohol and tobacco companies.[27]

The Philanthropic Support Agreement associated with the White House Ballroom creates a express exception: under the agreement, the TNM "is responsible for vetting all indirect donations irrespective of amount and may accept donations from companies that produce or distribute alcohol and/or tobacco."[28] While NPS may view such an exception as permissible because the donations are indirect, it is difficult to square with NPS principles, policy, and guidance and risks associating the agency with products that are generally considered prohibited.

Committee Requests

To help the Committee better understand the Philanthropic Support Agreement and donor vetting requirements, please contact Oversight and Investigations minority staff at NRDems@mail.house.gov by August 28, 2026, with five potential dates and times for a briefing. At the briefing, please be prepared to discuss the following items:

1. Do the Philanthropic Support Agreement and donor vetting provisions contained therein comply with NPS policy, including Director's Order 21 and Reference Manual 21 Chapter 5?
    a. Why did NPS bypass key provisions of Director's Order 21, Reference Manual 21 Chapter 5, and the NPS Template Philanthropic Support Agreement in drafting this agreement with EXR and TNM?
    b. Who was involved in making those decisions?
2. What steps did NPS take to prepare TNM to review donations to the Ballroom project, including large donations that are typically vetted by the agency?
3. Why were independent audit provisions omitted from the Philanthropic Support Agreement?
4. Why does the Philanthropic Support Agreement allow for an exception to NPS policy barring donations from tobacco companies?
5. Are any NPS staff, funding, or indirect donations being used to construct the below-ground structure of the former East Wing?
6. How did EXR identify donors and what information regarding their identities was shared with NPS and TNM?
    a. Were any foreign donors identified and, if so, were standard vetting procedures applied to their donations despite the anonymity provisions included in the Philanthropic Support Agreement?
    b. Were any potential donors rejected during the vetting process?

---

[26] National Park Service. *Director's Order #21: Donations and Philanthropic Partnerships, as amended by Memoranda dated August 31, 2020, May 18 and December 5, 2023, November 21, 2024, and March 3, 2025.* https://www.nps.gov/subjects/policy/upload/DO_21_12-28-2016.pdf
[27] Public Health Organizations Letter to National Park Service. October 26, 2016. https://www.citizen.org/wp-content/uploads/letter-to-the-nps-alcohol-coalition.pdf
[28] Philanthropic Support Agreement Between the National Park Service, the White House and President's Park, and the Executive Residence at the White House, Executive Office of the President and the Trust for the National Mall. https://www.citizen.org/wp-content/uploads/White-House-Ballroom-Funding-Agreement.pdf

7. Did the agency conduct a feasibility study and prepare an Annual Work Plan for the fundraising efforts? If not, were there any exemption requests or relevant waivers associated with the Philanthropic Support Agreement?
8. Were there any gift agreements associated with the project and, if so, did they include restrictions on donated funds?
9. How do donors expect to be recognized for their contributions to the project? Is all anticipated donor recognition consistent with NPS policy, Public Law 113-291, and 54 USC 101101(b)(4)(E)?

The White House is a protected site that belongs to the American people. It is not private property subject to the whims of a President determined to use it for his own aggrandizement. Any substantial modification must be handled with transparency, ethical integrity, congressional authorization, and full compliance with the law. This administration has repeatedly flouted statutory requirements, including the requirement to get congressional authorization for the proposed White House Ballroom. NPS policy reiterates that "philanthropic support for parks and programs continues to be an important supplement – not a replacement – for Federal appropriations."[29]

NPS policy clearly spells out requirements for vetting donors to evaluate whether the donation might damage "public confidence in the integrity and impartiality" of NPS.[30] The appearance that this Philanthropic Support Agreement and the ensuing funding scheme may have selectively sidestepped NPS's own policies raises concerns about the project's physical and ethical integrity, especially when the public opposes the Ballroom project by a two-to-one margin.[31] Working families facing high costs deserve a government focused on serving them, not private and anonymous donors funding the President's vanity projects as rising gas prices and inflation continue to raise the cost of living.[32] At minimum, the public deserves to know who is funding the Ballroom project, what its donors may expect in return, and whether NPS followed the safeguards designed to protect public confidence in the agency.

We look forward to your prompt response.

Sincerely,

Jared Huffman
Ranking Member
U.S. House Committee on Natural Resources

Maxine Dexter
Ranking Member
Subcommittee on Oversight and Investigations

[29] National Park Service. *Director's Order #21: Donations and Philanthropic Partnerships, as amended by Memoranda dated August 31, 2020, May 18 and December 5, 2023, November 21, 2024, and March 3, 2025.* https://www.nps.gov/subjects/policy/upload/DO_21_12-28-2016.pdf
[30] National Park Service. *Reference Manual 21 – Chapter 5.* https://www.nps.gov/subjects/partnerships/rm-21-chapter-5.htm
[31] Emily Guskin. ABC News. *Americans oppose Trump ballroom 2-to-1; even more oppose his signature on money: ABC News/Washington Post/Ipsos poll.* April 30, 2026. https://abcnews.com/Politics/americans-oppose-trump-ballroom-2-1-oppose-signature/story?id=132503095
[32] Steve Holland, Andy Sullivan, Richard Cowan, and Nandita Bose. Reuters. *Trump talks up his ballroom plan dozens of times but plays down Americans' economic pain.* May 24, 2026. https://www.reuters.com/world/us/trump-talks-up-his-ballroom-plan-dozens-times-plays-down-americans-economic-pain-2026-05-24/