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

August 21, 2026

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Ms. Townsend and Ms. Willmann:

As the official nonprofit, nonpartisan philanthropic partner for the National Mall and Memorial Parks, the White House grounds, and President's Park, the Trust for the National Mall (the Trust) is dedicated to the restoration and educational enrichment of the National Mall, the White House, and President's Park.[1,2] However, the type, scale, and secrecy around the donations for the White House Ballroom project raise questions about the ethical integrity of the development, as well as the potential risk of purchased access, conflicts of interest, and favors for wealthy donors. The Trust may have been used as a vehicle for billionaires and corporations to curry political favor with the Trump administration in a potential violation of federal law. The opaque fundraising scheme employed for the White House Ballroom may require legislative reform to strengthen philanthropic guardrails and protect our parks. Pursuant to Rule X of the Rules of the House of Representatives, the Committee on Natural Resources has broad jurisdiction to conduct oversight on matters related to public lands, the National Park Service (NPS), parks within the District of Columbia, and monuments erected therein. We request a briefing from the Trust to better understand the fundraising agreements and donor vetting procedures for the White House Ballroom project.

Ballroom Donation Transparency and Integrity

In October 2025, the President solicited Ballroom donations from corporate executives at an extravagant White House dinner.[3,4] After public outcry and speculation that the President solicited private donations in order to exploit gaps in federal disclosure rules and evade congressional oversight,[5] the White House released an incomplete list of 37 of the donors.[6] That list failed to include the identities of anonymous donors, the amount received from each, and any agreements between donors and the White House, the Trust, or any other third party.

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[1] The Trust for the National Mall. *Mission.* https://nationalmall.org/mission
[2] Nicholas, Peter and Lebowitz, Megan. *How a nonprofit went from cherry trees and pickleball to handling the money for Trump's ballroom.* NBC News. October 31, 2025. https://www.nbcnews.com/politics/white-house/nonprofit-trust-national-mall-trump-ballroom-white-house-rcna240543
[3] Farhi, Arden and Jacobs, Jennifer. *Trump looks to cement his architectural legacy as Democrats bristle*. CBS News. October 17, 2025. https://www.cbsnews.com/news/trump-looks-to-cement-his-architectural-legacy-as-democrats-bristle/
[4] McGraw, Meridith. *Trump Hosts Corporate Ballroom Donors at Glitzy White House Dinner.* The Wall Street Journal. October 16, 2025. https://www.wsj.com/politics/policy/trump-ballroom-donors-white-house-dinner-ccba9448?gaa_at=eafs&gaa_n=AWEtsqeUyW8Kkz_V9DvvHscU9AmRsN079oaElhtX70fpxz68aNJKTbjO9sKm&gaa_ts=6966d408&gaa_sig=A26EnX5Qqad6LPf3QHyC4kpIwebT_Q5QaaxUhgf9XXX76mmoz5X0NGYDfs6pZMq3_K6agb75O_kHcoMigoj8mQ%3D%3D
[5] 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
[6] Citizens for Responsibility and Ethics in Washington. *White House ballroom donations should be disclosed on lobbying disclosure reports.* February 4, 2026. https://www.citizensforethics.org/reports-investigations/crew-investigations/white-house-ballroom-donations-should-be-disclosed-on-lobbying-disclosure-reports/

Furthermore, donors have not been transparent about the amount they donated to the project or whether they expect to receive anything in exchange.[7] As of this letter, only one of the listed donors has disclosed their donations to the White House Ballroom through lobbying disclosure filings.[8,9] Many of the publicly listed donors have financial or business interests before the federal government; some are involved in active litigation against the federal government.[10] The Trust's refusal to cooperate with congressional requests as basic as a meeting[11] and government watchdogs' requests for transparency means that key details regarding the fundraising, donors, and terms of donations remain undisclosed.[12] NPS has a long history of leveraging private philanthropy to support the National Park System.[13,14] Indeed, as NPS Director's Order 21 acknowledges, "a number of national parks exist because motivated citizens contributed their time, talent, and funds to create them."[15] 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 integrity, impartiality, and public confidence in NPS and Department of the Interior (DOI)."[16]

Ballroom Agreement Between the Trust, NPS, and the White House

NPS appears to have asked the Trust to manage donations for the project.[17] The Trust has confirmed that "specific to the White House Ballroom project, the Trust, in its capacity as the official philanthropic partner of NPS for the White House and President's Park, is managing the private donations gifted to support the project. The Trust is not soliciting donations for the Ballroom and has no role in the planning, design, or construction of the new Ballroom."[18]

After the release of the Philanthropic Support Agreement (Agreement) between the Executive Residence at the White House (EXR), NPS, and the Trust governing the Ballroom Project was

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[7] 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/
[8] Lobbying Disclosure Act (LDA) Reports search. https://lda.gov/system/public/
[9] Citizens for Responsibility and Ethics in Washington. *White House ballroom donations should be disclosed on lobbying disclosure reports.* February 4, 2026. https://www.citizensforethics.org/reports-investigations/crew-investigations/white-house-ballroom-donations-should-be-disclosed-on-lobbying-disclosure-reports/
[10] 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/
[11] Letter from the Trust for the National Mall to Senator Elizabeth Warren. November 17, 2025. https://www.warren.senate.gov/wp-content/uploads/media/doc/response_from_the_trust_for_the_national_mall_to_senator_warren_11725.pdf
[12] 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/
[13] National Park Service. *Creation of Grand Teton National Park (A Thumbnail History).* January 2000. https://www.nps.gov/grte/planyourvisit/upload/creation.pdf
[14] National Park Service. *Acadia National Park – Founding Acadia.* Updated December 21, 2023. https://www.nps.gov/acad/learn/historyculture/founding.htm
[15] 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
[16] *Id.*
[17] Nicholas, Peter and Lebowitz, Megan. *How a nonprofit went from cherry trees and pickleball to handling the money for Trump's ballroom.* NBC News. October 31, 2025. https://www.nbcnews.com/politics/white-house/nonprofit-trust-national-mall-trump-ballroom-white-house-rcna240543
[18] Letter from the Trust for the National Mall to Senator Elizabeth Warren. November 17, 2025. https://www.warren.senate.gov/wp-content/uploads/media/doc/response_from_the_trust_for_the_national_mall_to_senator_warren_11725.pdf

compelled by a federal judge, it was made public on April 22, 2026.[19] The Agreement lays out the Trust's roles and responsibilities.[20]

The Agreement establishes the fundraising and donor vetting structure for the Ballroom project. EXR is tasked with identifying potential donors, connecting them with the Trust, and communicating whether a potential donor intends to maintain anonymity.[21] Responsibility for expediting decisions and agreements, promoting best philanthropic practices, and preserving the anonymity and privacy of donors is shared by NPS, EXR, and the Trust.

The Trust is authorized by NPS to vet and accept 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 the Trust to NPS accounts. The Agreement tasks the Trust, as the "Partner" in the terms of the agreement, with managing and processing donations, reviewing proposed donations to ensure they meet NPS requirements, and maintaining the anonymity of donors "unless explicitly authorized in writing by EXR."[22] The agreement specifies that "the Partner is responsible for vetting all indirect donations irrespective of amount and may accept donations from companies that produce or distribute alcohol and/or tobacco."[23]

Under the Agreement, donations in excess of $25,000 require the Trust to take reasonable efforts to determine whether the donor is involved in litigation involving NPS or DOI, is engaged in or seeking a business or permit relationship with the NPS, has been debarred from contracting with a federal agency, has a recent history of civil or criminal violations, or is a foreign national or foreign entity.[24] Before accepting donations, the Trust will consult with the NPS.

Aside from donor review procedures, the Agreement dictates that the Trust "may retain an administrative fee of 2.5% of the first $200 million in cash donations (or donations of other assets that can be liquidated) received by the Partner under this Agreement (i.e., up to $5 million); after the first $200 million in donations have been received and processed, the Partner's administrative fee for any additional donated amounts received and processed by the Partner under this Agreement will be 2% of any such amounts."[25]

Aspects of the 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, Chapter 5. The Agreement raises concerns about potential favorable treatment from the federal government and has prompted significant concern from government ethics experts.[26,27] NPS policies exist in part to protect the agency's

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[19] 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/

[20] 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

[21] *Id.*

[22] *Id.*

[23] *Id.*

[24] *Id.*

[25] *Id.*

[26] 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

[27] 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

reputation against conflicts of interest.[28] Partner organizations like the Trust have an obligation under NPS policy to conduct a review of donations to ensure that the agency's reputation is preserved.

Agreement vs. NPS Policy

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.[29]

NPS Director's Order 21 requires Philanthropic Support Agreements for short-term projects with third-party fundraising expected to raise over $25,000.[30] These agreements give partners the authority to fundraise on behalf of the agency and "document the nature of the relationship, defines roles and responsibilities, and ensures compliance with all applicable sections and requirements of Director's Order 21."[31]

The Agreement deviates considerably from both NPS policy and the agency's template Partnership Support Agreement.[32] 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 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 a donation to benefit 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."[33] NPS provides partner groups with guidance including a donor review and decision worksheet that details donor evaluation criteria.[34] Those evaluation criteria 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.[35]

NPS Reference Manual 21, Chapter 5 provides further donor vetting thresholds for both direct and indirect donations. Under this policy, official philanthropic partners are to review all donations

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[28] 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
[29] National Park Service. *Reference Manual 21 – Chapter 6.* https://www.nps.gov/subjects/partnerships/rm-21-chapter-6.htm
[30] *Id.*
[31] *Id.*
[32] National Park Service. *Philanthropic Support Agreement Template.* https://www.nps.gov/subjects/partnerships/upload/PHILANTHROPIC-SUPPORT-AGREEMENT-Template-to-use-508.docx
[33] 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
[34] National Park Service. *Donor Review Decision Worksheet.* https://www.nps.gov/subjects/partnerships/upload/Tool-Donor-Review-Decision-Worksheet-508.docx
[35] 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

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."[36] 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.[37] 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 the Trust excludes a gift acceptance policy section.

NPS Reference Manual 21 Chapter 5.5 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."[38] 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 it 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 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 DOI, it does not require this vetting for any other Executive Branch department or agency outside of DOI.

Under normal circumstances, limiting donor vetting to those with business before DOI and its bureaus 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 DOI. Without a fulsome review of all potential conflicts, litigation, or other business before the federal government, the Agreement allows entities heavily engaged with and regulated by any part of the federal government to curry favor with the head of the Executive Branch without a full review of all potential conflicts of interest.

The Agreement spells out that "notwithstanding Sections 5.1 and 5.4 of DO 21, the Partner [the Trust] is responsible for vetting all indirect donations irrespective of amount." However, under the Agreement, there are clear contradictions with NPS guidance and policy. This agreement deprives NPS of the responsibility to vet donations for the White House Ballroom, despite longstanding NPS 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.

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[36] National Park Service. *Reference Manual 21 – Chapter 5.* https://www.nps.gov/subjects/partnerships/rm-21-chapter-5.htm
[37] *Id.*
[38] *Id.*

Anonymity

Under the Philanthropic Support Agreement, EXR is tasked with donor recruitment and referral to the fundraising partner. 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 Agreement therefore not only prevents a fulsome vetting of potential conflicts of interest by blinding the Trust to the very donor it needs to research, but it bakes in an inherent risk of conflict of interest by ensuring these donors are notably *not* anonymous to the White House from which they may be seeking favor. This is the exact opposite of a structure designed to prevent conflicts of interest. A third-party vetting entity should have full visibility of the donor identity while the project proponent should not.

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."[39] 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 who wishes to remain anonymous."[40] The agreement therefore appears to create a backdoor for foreign entities to donate without meaningful review by simply requesting anonymity.

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.[41] At minimum, the public deserves to know who is funding the Ballroom project, what its donors may expect in return, and whether the Trust conducted thorough donor vetting to safeguard the NPS from corruption.

Committee Requests

To help the Committee better understand the Philanthropic Support Agreement and the Trust's donor vetting process, 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. What steps did NPS take to prepare the Trust to review donations to the Ballroom project, including large donations that are typically vetted by the agency?
2. How did EXR identify donors, and what information was shared with the Trust regarding donor recruitment and donor identities?

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[39] *Id.*

[40] 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

[41] 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

    a. Did the Trust coordinate with Meredith O'Rourke and/or Abby Matthis?
        i. If yes, what were Meredith O'Rourke and Abby Matthis's role in donor review?
        ii. Did the Trust receive any pressure to avoid donor review and vetting for any donors identified by anyone affiliated with EXR, O'Rourke, or Matthis? If so, which donors?
3. Have donations from non-U.S. citizens been accepted for the Ballroom?
    a. If any foreign donors were identified, what vetting procedures were applied to their donations?
4. What is the Trust's gift acceptance policy?
5. Were any potential donors rejected during the vetting process? If so, on what grounds?
6. Was the Trust told the identity of donors who requested anonymity?
    a. If no, was the Trust told whether or not anonymous donors were foreign entities?
7. Did the Trust conduct a full vetting process for donors who elected to remain anonymous? If so, please provide details of the protocol used to vet anonymous donors.
8. What donor review process did the Trust follow to vet all donations for the White House Ballroom project?
9. Were there any gift agreements associated with the project and, if so, did they include restrictions on donated funds?
10. Will the Trust be undertaking a financial audit in accordance with NPS policy that dictates that partner groups undertake financial audits if they raise over $1 million for the benefit of the agency?
    a. If yes, will the Trust furnish a copy of that audit to NPS and to all members of this Committee?
    b. If the review finds any wrongdoing, will the Trust commit to taking corrective action?
11. 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 U.S.C. 101101(b)(4)(E)?

The White House and President's Park are among the most historically significant and nationally treasured public spaces in the United States. The recent steps taken by the Trump administration to demolish the East Wing and build a 90,000 square-foot ballroom in its place represent some of the most significant alterations to the White House in our 250-year history. The White House and its grounds are not private property subject to the whims of the President. They are not Donald Trump's billionaire playground; they belong to the American people. Yet this administration has subverted legally required review processes and transparency standards, inappropriately engaged billionaire donors and those with business before the federal government, and imperiled the Trust for the National Mall's integrity. Without public transparency, the Trust risks eroding public trust and the rule of law.

Courts have long recognized broad constitutional authority for Congress to obtain information in support of our legislative and oversight obligations, including non-public information.[42] This request is for a valid legislative purpose pursuant to the Committee's constitutional oversight

[42] See *Trump v. Mazars USA, LLP*, 591 U.S. __, 140 S. Ct. 2019 (2020); *McGrain v. Daugherty*, 273 U.S. 135 (1927); *Watkins v. United States*, 354 US 178, 187 (1957); *Townsend v. United States*, 95 F.2d 352, 361 (D.C. Cir.), cert. denied, 303 U.S. 665 (1938).

authority and applicable House rules. Congressional committees regularly receive non-public and statutorily confidential information, including materials that federal law shields from public release, and maintain established procedures to protect such information.

Last October, the House Committee on Natural Resources requested a meeting with the Trust regarding donations for the White House Ballroom. In the Trust's response on November 7, 2025, you denied the meeting and refused to comply with this congressional inquiry. The Trust's letter states that "donor names and identifying information are not subject to public disclosure under 26 U.S.C. § 6104, and we strictly adhere to those confidentiality requirements." However, nothing in 26 U.S.C. § 6104 purports to restrict disclosure of information to Congress, create a statutory confidentiality requirement or evidentiary or testimonial privilege binding on organizations when responding to a congressional inquiry, or otherwise constrain the authority of a congressional committee to obtain information in aid of its legislative and oversight responsibilities. Compliance with 26 U.S.C. § 6104 public inspection requirements neither satisfies nor substitutes for your obligation to respond fully to a congressional inquiry. Section 26 U.S.C. § 6104 also does not provide a lawful basis to categorically withhold responsive donor-related records from the Committee.

If you have any questions about this request, please contact Natural Resources Committee minority staff at (202) 225-6065. Thank you for your attention to this matter.

Sincerely,

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

Maxine Dexter
Ranking Member
Subcommittee on Oversight and Investigations