

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

October 8, 2025

Caryl Brzymialkiewicz
Acting Inspector General
Office of the Inspector General
U.S. Department of the Interior
1849 C Street N.W. - Mail Stop 4428
Washington, D.C. 20240

Dear Acting Inspector General Brzymialkiewicz:

We write to request that your office investigate whether Mr. Matthew Giacona, Acting Director of the Bureau of Ocean Energy Management (BOEM), has violated federal ethics rules by participating in particular matters that directly overlapped with his prior lobbying work for the National Ocean Industries Association (NOIA), or otherwise disregarding his federal ethics obligations. Before entering government, Mr. Giacona lobbied on consequential offshore oil and gas issues before BOEM, including the Gulf of Mexico Endangered Species Act Biological Opinion (BiOp), protections for the endangered Rice's whale, and Lease Sale 262.¹ Shortly after arriving at BOEM, he appears to have engaged on the same subject-matter areas within BOEM leadership.

Federal ethics rules require executive branch employees to avoid participating in matters in which their impartiality could reasonably be questioned or in which they have a covered relationship, absent written authorization.² Upon onboarding, the Departmental Ethics Office (DEO) directed Mr. Giacona to begin implementing recusals immediately. On March 27, 2025, the DEO issued interim guidance requiring him to identify, implement, and adhere to recusals and screenings in real time while DEO completed its tailored review tied to his financial disclosure.³ The ethics briefing materials provided to him by the DEO expressly included former employers as covered relationships that would trigger federal impartiality rules.⁴ On July 25, 2025, the DEO finalized his Recusals & Screening Arrangement (RSA) and accompanying guidance, categorically prohibiting Mr. Giacona until March 2026 from participating personally and substantially in any particular matter he knew would have a direct and predictable effect on NOIA's financial interests, which are inherently tied to the interests of the specific companies comprising NOIA's membership, such as Chevron and Transocean.⁵

¹ Matt Giacona, LINKEDIN, <https://www.linkedin.com/in/mattgiacona> (last accessed Sep. 23, 2025); *see also* Jimmy Tobias & Hana Beach, *He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them*, PUBLIC DOMAIN (Jun. 27, 2025), <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>.

² *See* 5 C.F.R. pt. 2635, §§ 2635.101(b), 2635.502 (2025).

³ Email from Heather Gottry, Director, Departmental Ethics Off., Dep't of the Interior, to Matthew Giacona, Principal Deputy Director, Bureau of Ocean Energy Mgmt. (Mar. 24, 2025) (on file with the Committee); Memorandum from Stacey Huss Ginsberg, Attorney Advisor, Off. of the Solic., to Matthew Giacona, Senior Advisor to the Sec'y, Dep't of the Interior (Mar. 27, 2025) (on file with the Committee).

⁴ Dep't of the Interior, Off. of the Solic., Departmental Ethics Off., *Ethics Briefing: Onboarding for Political Appointees* (Mar. 24, 2025) (included as an attachment in the March 24th email from Heather Gottry to Matthew Giacona) (on file with the Committee).

⁵ Memorandum from Heather C. Gottry, DEO Director, Off. of the Solic., to Matthew Giacona, Principal Deputy Director, Bureau of Ocean Energy Mgmt. (Jul. 25, 2025) (on file with the Committee).

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Despite these obligations, Mr. Giacona appears to have engaged on the same subject-matter areas on which he lobbied while at NOIA during the interim-guidance period and thereafter. On April 2, 2025, after a Chevron lobbyist requested a meeting regarding the draft Endangered Species Act BiOp, Mr. Giacona shared his contact information, as well as insider information that he would “soon be getting briefed by his agency’s staff on the forthcoming biological opinion.”⁶ He had his chief of staff arrange a same-day meeting for Chevron with senior Department officials to present the company’s “highlights.”⁷ In the days and weeks that followed, he continued to engage personally on the BiOp. On April 4, 2025, he reported internally that he and a colleague had a “great conversation with the politicals at NOAA” that included the BiOp and anticipated close coordination.⁸ On April 8, 2025, in a Department email regarding the Gulf BiOp on which a Chevron lobbyist was included, Mr. Giacona was identified as a departmental point of contact.⁹ On May 5, 2025, he emailed NOAA’s deputy assistant secretary seeking points of contact for the 2025 National Marine Fisheries Service (NMFS) BiOp for oil and gas operations in the Gulf of Mexico.¹⁰

Industry advocates also continued to route BiOp-related advocacy through Mr. Giacona. On April 29, 2025, the American Petroleum Institute requested a meeting with him and Department leadership to discuss concerns with the draft BiOp.¹¹ His official calendar also reflects a May 7, 2025, meeting with Transocean and a May 8, 2025 meeting with Chevron on offshore issues.¹² Concurrently, he worked internally on Lease Sale 262, writing on April 24, 2025, that he had “reviewed all documents in the 262 [Proposed Notice of Sale] package.”¹³ He followed by conducting a directorate briefing on April 29 and additional internal meetings on May 12 and May 21, 2025.¹⁴ These are only the instances we know about.

⁶ Jimmy Tobias & Hana Beach, *He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them*, PUBLIC DOMAIN (Jun. 27, 2025), <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>.

⁷ Jimmy Tobias & Hana Beach, *He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them*, PUBLIC DOMAIN (Jun. 27, 2025), <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>.

⁸ *Supra* note 5; E-mail from Matthew Giacona, Principal Deputy Director, Bureau of Ocean Energy Mgmt., to Brittany Kelm, et al. (Apr. 4, 2025, 5:00 PM), <https://s3.documentcloud.org/documents/25985267/giacona-emails.pdf>.

⁹ E-mail from Gregory Wischer, Deputy Assistant Sec’y of Lands and Minerals, Dep’t of the Interior, to Carrie Domnitch, Manager of Fed. Gov’t Affairs, Chevron (Apr. 8, 2025, 6:32 AM), <https://s3.documentcloud.org/documents/25985267/giacona-emails.pdf>.

¹⁰ E-mail from Matthew Giacona, Principal Deputy Director, Bureau of Ocean Energy Mgmt., to Erik Noble, Deputy Assistant Sec’y of Oceans and Atmosphere, Nat’l Oceanic and Atmospheric Admin. (May 5, 2025, 2:09 PM), <https://s3.documentcloud.org/documents/25985267/giacona-emails.pdf>.

¹¹ E-mail from Holly Hopkins, Vice President of Upstream Policy, Am. Petroleum Inst., to Candice Woods, Exec. Assistant, Off. of the Assistant Sec’y of Land and Mineral Management, Dep’t of the Interior (Apr. 29, 2025, 4:19 PM), <https://s3.documentcloud.org/documents/25985267/giacona-emails.pdf>.

¹² Jimmy Tobias & Hana Beach, *He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them*, PUBLIC DOMAIN (Jun. 27, 2025), <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>.

¹³ E-mail from Matthew Giacona, Principal Deputy Director, Bureau of Ocean Energy Mgmt., to Jennafer Foreman, Chief of Staff, Off. of the Director, Bureau of Ocean Energy Mgmt. (Apr. 24, 2025, 3:39 PM), <http://s3.documentcloud.org/documents/25985267/giacona-emails.pdf>.

¹⁴ Jimmy Tobias & Hana Beach, *He Lobbied For Offshore Oil Drillers. Now He Runs The Agency That Regulates Them*, PUBLIC DOMAIN (Jun. 27, 2025), <https://www.publicdomain.media/p/matt-giacona-offshore-oil-lobbyist-boem>.

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Taken together, these actions call into question Mr. Giacona's adherence to federal ethics rules, which from the outset of his service unmistakably identified NOIA as a covered relationship and required his immediate recusal and screening from any covered activity implicating NOIA. The DEO's subsequent issuance of the July 25 RSA formally corroborated these obligations: he was prohibited from personal and substantial participation in particular matters involving specific parties in which NOIA was a party or represented a party, absent written authorization. The available record provides no indication that such authorization was ever granted, and his company-specific engagements with NOIA member firms functioned as a de facto backdoor to the very participation the impartiality rules were designed to prevent.

These ethics concerns are especially troubling in the midst of the Trump Administration's ongoing attack on energy security, including the cancellation of offshore wind projects that would deliver more affordable energy for Americans.¹⁵ Rather than providing a level playing field, the Administration is picking winners and losers in the energy sector, which is "increasing consumer prices, slowing down innovation and ultimately undermining competitiveness."¹⁶ In fact, Mr. Giacona's potential ethical lapses appear to be central to this agenda. Elevating a former oil and gas lobbyist into a regulatory role over the same industry is emblematic of an Administration that has abandoned even the pretense of impartiality. This conduct undermines public confidence that federal regulators are acting in the public interest and demands close scrutiny by your office.

We request that your office conduct an investigation into whether Mr. Giacona violated federal ethics requirements or guidance by using his position to give his former industry association or its Big Oil member companies special access to the agency that regulates them.

The inquiry should address questions that include, but are not limited to:

1. Whether Mr. Giacona's participation in particular matters involving specific parties—including, but not limited to, the Gulf of Mexico BiOp and Lease Sale 262—was inconsistent with the March 27, 2025, interim guidance, the impartiality standard set forth in 5 C.F.R. § 2635.502, or other applicable federal ethics obligations;
2. Whether Mr. Giacona obtained any written authorization permitting him to participate in particular matters involving NOIA or its member companies, and, if so, whether such authorizations were validly issued and consistent with applicable federal ethics requirements;
3. What recusal or screening arrangements were actually established by BOEM or DOI to prevent Mr. Giacona's involvement in covered matters, and whether those arrangements were effectively implemented and enforced;
4. Whether industry actors, including NOIA and its member companies, such as Chevron, Transocean, or the American Petroleum Institute sought to route advocacy through Mr. Giacona

boem.

¹⁵ Jake Spring & Evan Halper, *Trump's War on Wind Just Got Much Bigger*, WASH. POST (Sep. 3, 2025), <https://www.washingtonpost.com/climate-environment/2025/09/03/revolution-wind-offshore-permit>.

¹⁶ Amalia Huot-Marchand, *Trump's War on Wind, Solar Rattles Clean Energy Industry*, THE HILL (Aug. 26, 2025), <https://thehill.com/policy/energy-environment/5469700-trump-clean-energy-rollback-impact>.

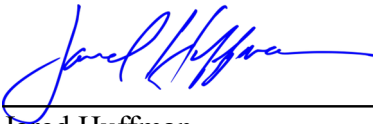
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following his appointment, and whether he facilitated or participated in such contacts notwithstanding his recusal obligations; and

5. Whether Mr. Giacona's conduct, viewed in light of the Department's ethics guidance, federal impartiality standards, and other applicable federal ethics obligations, compromised compliance with federal ethics rules at BOEM or DOI, and what corrective or remedial actions may be necessary to protect the integrity of the agency's decision-making processes.

Please contact the Natural Resources Committee Subcommittee on Oversight and Investigations minority staff at (202) 225-6065 with any questions about this request. We look forward to your prompt response to this important oversight request.

Sincerely,



Jared Huffman
Member of Congress
Ranking Member, Committee
on Natural Resources



Teresa Leger Fernández
Member of Congress
Ranking Member,
Subcommittee on Indian and
Insular Affairs



Val Hoyle
Member of Congress
Ranking Member,
Subcommittee on Water,
Wildlife and Fisheries



Maxine Dexter
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