

October 3, 2025

Ms. Caryl Brzymialkiewicz
Acting Inspector General
Office of Inspector General
U.S. Department of the Interior
Attention: Intake Management Unit
1849 C Street, NW.
MS 4428
Washington, DC 20240

Dear Acting Inspector General Brzymialkiewicz:

I am writing to formally complain about a violation of the Anti-Lobbying Act (18 U.S.C. § 1913) by officials at the Department of the Interior. This complaint requests that the DOI Office of Inspector General investigate the Department's use of appropriated federal funds to disseminate partisan political messaging during the September 30, 2025, government shutdown.

Background and Factual Allegations

During the government shutdown that began on September 30, 2025, the Department of the Interior distributed official communications to DOI staff that contained explicit partisan messaging about the shutdown. These communications served no legitimate operational purpose related to the Department's mission of managing America's natural resources and cultural heritage.

According to reports, the official department messages stated that "ANY LAPSE IN GOVERNMENT FUNDING WOULD BE FORCED BY CONGRESSIONAL DEMOCRATS" and described Democrats as blocking a clean continuing resolution to pursue unrelated policy demands. These partisan statements were communicated through official DOI channels and government systems, using taxpayer resources to advance political messaging that assigned blame to one political party while defending the Trump Administration's position on the shutdown.

Rather than providing neutral information about which Interior Department functions would continue during the shutdown or how the public could access essential services, these communications served purely partisan purposes—explicitly blaming Congressional Democrats for the appropriations lapse while promoting the Administration's legislative priorities.

Legal Violation

The Anti-Lobbying Act, codified at 18 U.S.C. § 1913, prohibits federal agencies from using appropriated funds for activities designed to influence members of Congress or to encourage the public to contact Congress about pending legislation. The statute specifically provides:

No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of

Congress, a jurisdiction, or an official of any government, to favor, adopt, or oppose, by vote or otherwise, any legislation, law, rule, regulation, policy, or appropriation.

The DOI's partisan messaging violated this prohibition by using government resources—including official DOI communication systems, federal employee time, and taxpayer-funded infrastructure—to advance political positions that served no official agency function.

Specific Violations

The DOI's actions violated the Anti-Lobbying Act in the following ways:

1. **Use of Appropriated Funds for Political Messaging:** The creation, approval, and distribution of partisan political content through DOI communication systems required the use of federal employee time, government infrastructure, and other taxpayer-funded resources in violation of 18 U.S.C. § 1913.
2. **Grassroots Lobbying Activity:** By explicitly blaming "Congressional Democrats" for the shutdown while defending the Administration's position, the messages were designed to influence public opinion about political matters rather than provide neutral information about DOI operations.
3. **Exceeding Authorized Appropriations:** DOI has no congressional authorization to use appropriated funds for partisan political communications. Such expenditures exceed the Department's authorized appropriations and constitute improper obligations of federal funds.

Responsible Officials

Secretary Doug Burgum bears ultimate responsibility for the content distributed through official DOI communication systems. As the senior official overseeing the Department, he has authority over and responsibility for ensuring that DOI communications comply with federal law, including the Anti-Lobbying Act.

Evidence

I have attached supporting documentation that details the partisan political messaging distributed through official DOI channels.

Request for Investigation

I respectfully request that the DOI Office of Inspector General conduct a thorough investigation into this apparent violation of the Anti-Lobbying Act, including:

1. Determining who authorized the creation and distribution of the partisan political messaging through DOI communication systems;
2. Identifying what federal resources were used to create, approve, and distribute this content;
3. Calculating the cost to taxpayers of the government resources used for partisan political purposes;
4. Reviewing DOI policies and procedures to determine how such violations occurred; and
5. Recommending appropriate remedial actions and disciplinary measures.

Thank you for your attention to this serious matter. The American people deserve federal agencies that use taxpayer resources for legitimate government functions—such as managing America's natural resources and cultural heritage—not partisan political messaging that undermines the Department's mission.



Respectfully,
Omar H. Nouredin
Senior Vice President, Policy & Litigation
Common Cause

Exhibit A

ABC7, *Government websites displaying messages blaming Democrats for shutdown*, (October 1, 2025)
<https://abc7.com/post/government-websites-displaying-messages-blaming-democrats-shutdown/17918723/>

Fox News Channel, *Media bashes Trump admin messaging for pinning shutdown on Dems, White House fires back*, (October 2, 2025): <https://www.foxnews.com/politics/media-bashes-trump-admin-messaging-pinning-shutdown-dems-white-house-fires-back>

