



April 25, 2017

The Honorable Secretary of State Rex W. Tillerson
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520

Walter M. Shaub
Director
Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, D.C. 20005

Steve Linick
Inspector General
U.S. Department of State
Office of Inspector General
Room 8100, SA-3
2201 C Street, N.W. Washington, DC 20520-0308

Katherine D. McManus
Designated Agency Ethics Official (DAEO)
U.S. Department of State
Room 6419
2201 C Street, NW.
Washington, DC 20520-6310

Dear Secretary Tillerson, Director Shaub, Inspector General Linick and Ms. McManus,

On April 4, 2017, U.S. Department of State's website ShareAmerica published an article entitled *Mar-a-Lago: The winter White House*.¹ A summary of this article, with a link to the full article, was published on the website of the U.S. Embassy in the United Kingdom² and was also reportedly circulated by the U.S. Embassy in Albania.³

¹ Leigh Hartman, Mar-a-Lago: The winter White House, ShareAmerica, April 4, 2017, <https://share.america.gov/mar-a-lago-winter-white-house/> (Exhibit 1).

² See <https://uk.usembassy.gov/mar-lago-winter-white-house/> (Exhibit 2).

³ Darren Samuelsohn, State Department, U.S. embassies promoted Trump's Mar-a-Lago, POLITICO, April 24, 2017, <http://www.politico.com/story/2017/04/24/state-department-us-embassy-mar-a-lago-237537>.

The State Department article notes that President Trump owns Mar-a-Lago and operates it as a private club open to dues-paying members. The article describes the private club in glowing terms and explains that President's use of the club as a "winter White House" fulfills the dream of Mar-a-Lago's original owner, socialite and cereal heiress Marjorie Merriweather Post.

State Department use of resources to promote a private business owned by President Trump constitutes a misuse and abuse of taxpayer dollars. Federal regulation provides that "[a]n employee shall not use his public office ... for the endorsement of any product, service or enterprise[.]" 5 C.F.R. § 2635.702. This general prohibition on government employee endorsement of products, services or enterprises is repeated in subsection (c) of the regulation, with several exceptions that don't apply to the State Department's article promoting Mar-a-Lago. *See* 5 C.F.R. § 2635.702(c).

The Office of Government Ethics, which administers government ethics regulations generally, including this "endorsement" prohibition specifically, summarizes the prohibition as follows:

Subpart G contains four provisions designed to ensure that employee [*sic*] do not misuse their official positions. These include: A prohibition against employees using public office for their own private gain for the private gain of friends, relatives, or persons with whom they are affiliated in a non-Government capacity, or for the endorsement or any product, service, or enterprise[.]⁴

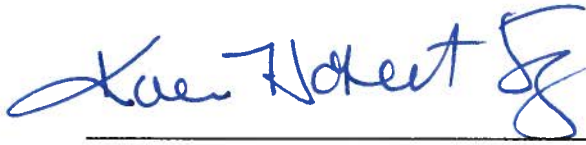
The State Department's publication of the article *Mar-a-Lago: The winter White House* on the ShareAmerica website, and promotion of the article by U.S. embassies clearly warrant investigation.

"It is the responsibility of the employing agency to initiate appropriate disciplinary or corrective action in individual cases[.]" and "corrective action may be ordered or disciplinary action recommended by the Director of the Office of Government Ethics under the procedures" set forth in at part 2638 of the Government Ethics code. 5 C.F.R. §§ 2635.106(b) and 2638.501-04.

Common Cause calls on the Department of State and Office of Government Ethics to conduct an investigation and to take disciplinary action to hold all responsible federal government employees accountable for this clear misuse and abuse of taxpayer funds.

⁴ U.S. Office of Government Ethics, 5 C.F.R. Part 2635: *Standards of ethical conduct for employees of the executive branch*, <https://www.oge.gov/web/oge.nsf/All%20Documents/5D633072D0B2DB5085257E96006A90E7?opendocument>.

Sincerely,

A handwritten signature in blue ink, reading "Karen Hobert Flynn" with a stylized flourish at the end.

Karen Hobert Flynn
President
Common Cause
805 Fifteenth Street, NW
Suite 800
Washington, DC 20005

Exhibit 1



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The first meeting between Trump and President Xi Jinping of China will take place April 6–7 at Mar-a-Lago, which is located at the heart of Florida’s Palm Beach community.

Trump is not the first president to have access to Mar-a-Lago as a Florida retreat, but he is the first one to use it. By visiting this “winter White House,” Trump is belatedly fulfilling the dream of Mar-a-Lago’s original owner and designer.

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The living room of the Mar-a-Lago estate. (Getty Images/Davidoff Studios)

When [socialite and cereal heiress Marjorie Merriweather Post](#) built Mar-a-Lago — Spanish for **SHAREAMERICA** no expense. The 114-room mansion sits on 8 hectares

the side and an inland waterway on the other.

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The white Jazz Age house was designed with old-world Spanish, Venetian and Portuguese influences and decorated with Post’s personal collection of antiques.





**Donald J. Trump** 
[@realDonaldTrump](#)

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Writing my inaugural address at the Winter White House, Mar-a-Lago, three weeks ago. Looking forward to Friday. [#inauguration](#)

12:33 PM · 18 Jan 2017



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A dream deferred

Mar-a-Lago was designated a National Historic Site in 1969 in recognition of its design and architecture. Three years later it was entered into the [National Register of Historic Places](#), a list of sites the U.S. deems worthy of preservation.

But Post had even bigger plans for her Palm Beach home. Upon her death in 1973, she willed the estate to the U.S. government, intending it to be used as a winter White House for the U.S. president to entertain visiting foreign dignitaries.



...ents Richard Nixon and Jimmy Carter never used the

ENGLISH 

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That opened the way for Trump, a real-estate magnate, to purchase the property in 1985. When he acquired the house, Trump also bought the decorations and furnishings that Post had collected over the years, preserving Mar-a-Lago's style and taste.



Tables are set for a luncheon in a ballroom at the Mar-a-Lago. (Getty Images/Davidoff Studios)


After refurbishing the house and adding an events space, Trump opened the estate to dues-paying members of the public in 1995 as the Mar-a-Lago Club.


Post's dream of a winter White House came true with Trump's election in 2016. Trump regularly works out of the house he maintains at Mar-a-Lago and uses the club to host foreign dignitaries. (In February, [Japan's Prime Minister Shinzo Abe](#) and his wife, Akie, visited.)



As Rick Rose, a local Palm Beach historian, [told USA Today](#), "[Post] finally got what she wanted."

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Mar-a-Lago: The winter White House

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Mar-a-Lago, President Trump's Florida estate, has become well known as the president frequently travels there to work or host foreign leaders.

The first meeting between Trump and President Xi Jinping of China will take place April 6–7 at Mar-a-Lago, which is located at the heart of Florida's Palm Beach community.

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When socialite and cereal heiress Marjorie Merriweather Post built Mar-a-Lago — Spanish for “Sea to Lake” — in 1927, she spared no expense. The 114-room mansion sits on 8 hectares of land, with the Atlantic Ocean on one side and an inland waterway on the other.

Upon her death in 1973, she willed the estate to the U.S. government, intending it to be used as a winter White House for the U.S. president to entertain visiting foreign dignitaries.

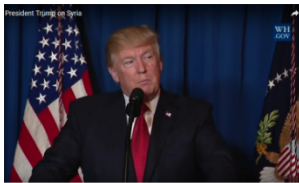
Read the full story at [ShareAmerica](#) !

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