



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

January 27, 2026

Sarah Nelson, Assistant Inspector General for Management
U.S. Department of Energy
Office of the Inspector General
1000 Independence Ave SW
Mail Stop 5D-031
Washington, DC 20585

Via email ighotline@hq.doe.gov

Re: Potential violation of 5 C.F.R. § 2635.702 by Assistant Secretary of Energy Audrey Robertson

Dear Assistant Inspector General Nelson,

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests that the U.S. Department of Energy’s Office of Inspector General (“DOE OIG”) investigate potential violations of the Standards of Ethical Conduct for Executive Branch Employees¹ and any other relevant conflicts of interest related to Assistant Secretary for Energy Audrey Robertson’s purported use of her official title and position in a commercial advertisement promoting jewelry products for sale. Senior administration officials set an example of the behavior expected from the federal workforce and must be held accountable to the standards of ethical conduct to ensure taxpayer funds are used appropriately and to maintain the American public’s trust in government institutions. A thorough independent investigation by DOE OIG is necessary to ensure that agency officials, including senior political appointees, operate with integrity and that the agency has sufficient internal controls to identify illegal and unethical behavior.

Assistant Secretary of Energy Audrey Robertson appears to have violated federal misuse of position regulations, 5 C.F.R. § 2635.702, when she appeared in an advertisement in Trice Jewelers’ 2026 Wish Book (see Appendix).² The catalog advertises the company’s jewelry products and includes photos and biographical information of various individuals who appear to have provided quotations with their images. Assistant Secretary Robertson’s

¹ 5 C.F.R. Part 2635.

² Trice Jewelers, 2026 Wish Book, <https://tinyurl.com/2fhibxxye>.

biography states, in part, that she is a “proud mother,” “recently engaged” and “now honored to serve our country at the Department of Energy as the Assistant Secretary of Energy (EERE) for the USA.” She appears in a photo placed among several products, their prices and the company’s phone number and website. The quotation associated with her picture states “My favorite piece of jewelry has a history, a story and purpose. My cherished pieces are from the remarkable women that came before me, that have inspired me, and also the new additions from sons and fiancé, they are just starting their story but filled with the love and adventure of our life together. Each holds special meaning that makes each piece cherished and even more beautiful.” It is unclear from the information available to CREW whether Ms. Robertson has a prior or ongoing relationship with Trice Jewelers, whether she received payment for her participation in the catalog or whether she sought or received ethics advice before appearing in the advertisement including her official government title. Ms. Robertson has certified that she received ethics training on her ethical obligations as an executive branch official.³ Recent media reports have noted that DOE issued a statement that Ms. Robertson’s appearance was made in her personal capacity prior to her confirmation and that the title was added by the vendor, and also stated that Ms. Robertson has since asked the company to make a correction.⁴ As of the date of this complaint, the 2026 Wish Book does not appear to be available on Trice Jewelers’ website.

The Standards of Ethical Conduct prohibit executive branch officials from using their public office for private gain (including for the gain of themselves or some third party), including for the endorsement of any product or enterprise.⁵ Specifically, the rule bars employees from using, or permitting the use of, their government position or title “in a manner that could reasonably be construed to imply that their agency or the Government sanctions or endorses their personal activities or those of another.”⁶ Furthermore, officials are prohibited from “us[ing] or permit[ting] the use of their Government position or title or any authority associated with their public office to endorse any product, service, or enterprise.”⁷

The Office of Government Ethics (“OGE”) guidance and opinions consistently advise that such use is a violation of the ethical standards.⁸ As a hypothetical example to the regulations, OGE provides guidance stating that, “[a]n Assistant Attorney General may not use their official title or refer to their Government position in a book jacket endorsement of a novel about organized crime written by an author whose work they admire. Nor may they

³ Ethics Agreement Compliance Certification, Audrey Robertson, <https://tinyurl.com/mtmwvmbtr>.

⁴ Christa Marshall, DOE official’s jewelry modeling raises ethics concerns, E&E News (Jan. 23, 2026), <https://www.eenews.net/articles/doe-officials-jewelry-modeling-raises-ethics-concerns/>.

⁵ 5 C.F.R. § 2635.702.

⁶ 5 C.F.R. § 2635.702(b).

⁷ 5 C.F.R. § 2635.702(c).

⁸ Letter from Walter M. Shaub, Jr., Director, Office of Government Ethics, to Stefan C. Passantino Deputy Counsel to the President and Designated Agency Ethics Official (Feb. 13, 2017), <https://tinyurl.com/598u3nyf>.

do so in a book review published in a newspaper.”⁹ OGE applied this rule to White House advisor Kellyanne Conway during President Trump’s first term, finding that “[t]here [was] strong reason to believe that Ms. Conway [had] violated” these rules when she appeared in a media interview in her official capacity and encouraged viewers to buy products from Ivanka Trump’s fashion business.¹⁰ Officials’ use of their government position and title in nonofficial contexts creates the appearance that the employee is using their public office for private gain of another, and OGE has consistently advised against including position and title in such instances to avoid violations of these rules.¹¹

Ms. Robertson’s appearance in the catalog, coupled with the biographical information specifically identifying her title and position at the Department of Energy, implies that her support of this private jeweler is made in her official capacity and backed by the weight of the federal government. Therefore, CREW asks DOE OIG to use its authority to investigate whether Ms. Robertson violated the standards of ethical conduct or other federal ethics laws by her appearance alongside her government title in this catalog, as well as whether sufficient internal controls are in place to prevent future violations.

Areas for investigation include:

1. Whether Ms. Robertson authorized the use of her title and position in the catalog.
2. Whether Ms. Robertson’s participation in the catalog was in any way related to her federal job duties.
3. Whether Ms. Robertson was paid or otherwise compensated for her participation in the advertisement or otherwise has a prior or current business relationship or financial interest with Trice Jewelers.¹²
4. Whether and from whom Ms. Robertson sought ethics advice related to her appearance in this catalog and whether she received approval or other clearance from an agency ethics official.

OGE has stated in past instances of administration officials engaging in commercial advertisements for private business interests that “not taking disciplinary action against a

⁹ 5 C.F.R. § 2635.702(c), ex. 4.

¹⁰ Charles S. Clark, Ethics Office Pressures White House to Discipline Kellyanne Conway, Government Executive (Feb. 14, 2017), <https://tinyurl.com/r89cmvf8>; Letter from Walter M. Shaub, Jr., Director, Office of Government Ethics, to Stefan C. Passantino Deputy Counsel to the President and Designated Agency Ethics Official (Feb. 13, 2017), <https://tinyurl.com/598u3nyf>.

¹¹ Letter to a Designated Agency Ethics Official dated October 30, 2002, Office of Government Ethics 02x9, <https://tinyurl.com/5n7jnvyd>; Letter to an Administrative Law Judge dated July 19, 2001, Office of Government Ethics 01x6, <https://tinyurl.com/2awwsv2u>.

¹² Any payment, financial interest, business relationship, or gifts (including in the form of free or discounted merchandise) that may have been involved in Ms. Robertson’s participation should be reviewed under federal ethics rules. *See, e.g.*, 5 C.F.R. Part 2635 Subpart B (Gifts from Outside Sources); Subpart E (Impartiality in Performing Official Duties); Subpart H (Outside Activities).

senior official under such circumstances risks undermining the ethics program.” Appointees of any administration serve as an example of the behavior expected from other officials at the agency, and misuse of a public position suggests that the agency and its officials are taking advantage of the privilege to serve the American people by elevating some private interests over the interests of the public as a whole. It is critical that DOE OIG conduct a thorough investigation of Ms. Robertson’s participation in any decision to use her official title in this private sales catalog to ensure the integrity of the agency’s work going forward. DOE has a critical mission on behalf of the American public including promoting “energy production and more affordable prices”; that does not include promoting jewelry products.¹³

CREW greatly appreciates your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DKS', followed by a long horizontal flourish.

Donald K. Sherman
President and Chief Executive Officer

¹³ *One Year In: Promises Made, Promises Kept*, U.S. Department of Energy (Jan. 20, 2026), <https://perma.cc/CQ3L-CW3U>.

Appendix I

“My favorite piece of jewelry has a history, a story and purpose. My cherished pieces are from the remarkable women that came before me, that have inspired me, and also the new additions from sons and fiancé, they are just starting their story but filled with the love and adventure of our life together. Each holds special meaning that makes each piece cherished and even more beautiful.”



A. 18k white gold diamond necklace with diamond drops \$14,200
B. Platinum and 18k yellow gold ring with a 5.00ct fancy yellow radiant center diamond. Call for price
C. 14k white gold inside-out diamond hoop earrings. Multiple sizes available. As shown \$6,350
D. 18k white gold diamond halo stud earrings. Multiple sizes available. As shown \$9,000
E. 18k white gold band with channel-set baguette and round diamonds \$22,700
F. 18k white gold band with black and white diamonds \$6,200

Audrey Robertson

Proud mother of Will (17) and Wyatt (16), recently engaged to Nathan Buelow, and a loving daughter, devoted friend and lifelong Cowgirl that has had an exciting and diverse career as an Oil and Gas Entrepreneur, Corporate Executive, Private Equity Portfolio Manager and now honored to serve our country at the Department of Energy as the Assistant Secretary of Energy (EERE) for the USA.

SIGNATURE TRICE COLLECTION

303-759-9661 12 www.tricejewelers.com