



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

May 11, 2026

The Honorable Mitch Behm
Deputy Inspector General, performing the duties of the Inspector General
Office of Inspector General
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Potential gift, travel, and ethics violations related to Secretary Sean Duffy and his family's participation in "The Great American Road Trip" reality show

Dear Deputy Inspector General Behm,

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the U.S. Department of Transportation's Office of Inspector General ("DOT OIG") investigate potential violations of federal gift and travel rules, the Standards of Ethical Conduct for Executive Branch Employees and any other relevant violations of federal law related to Secretary Sean Duffy's participation in a months long reality show production called "The Great American Road Trip." Secretary Duffy recently explained that over the course of seven months, he and his family participated in a reality program called "The Great American Road Trip" where he and his family toured the country as part of the secretary's effort "to lean in" and see America, while he squeezed in time to do "some work" in his taxpayer funded job.¹ Although a DOT spokesperson claimed that "production costs were paid for by The Great American Road Trip, Inc. – not taxpayers" and that the secretary and his family "d[id] not receive any **financial** compensation" for their participation, the venture was sponsored by numerous private companies regulated by the department including United Airlines, Toyota Motor Corporation, Boeing and other members of the transportation industry or impacted by DOT business.²

Given these reports, we urge your office to investigate the circumstances of the secretary's trip, including whether the arrangements and approval of the travel complied with agency protocol and guidance from agency ethics civil servants, whether and how much in taxpayer funds and staff time were spent on Secretary Duffy's participation or promotional materials for the show, whether any private funding for the project violated agency authority to receive gifts, whether Secretary Duffy solicited any gifts or he or his family received any gifts of travel or hospitality during the course of this reality show and whether any personal expenses that were

¹ *Sean and Rachel Campos-Duffy Launch 'The Great American Road Trip,'* Fox News (May 8, 2026), <https://www.foxnews.com/video/6394970597112>.

² Margaret Hartmann, *Sean Duffy Filmed Reality Show Over Past Seven Months*, Intelligencer (May 8, 2026), <https://nymag.com/intelligencer/article/sean-duffy-filmed-7-month-road-trip-worked-occasionally.html> (emphasis added).

May 11, 2026

Page 2

incurred by the agency from Secretary Duffy's personal activities during the trip were properly reimbursed.

I. Factual Background: Secretary Duffy announced that he and his family spent part of seven months traveling the country as part of "The Great American Road Trip" project, a privately sponsored promotional reality show set to air on YouTube to honor America's 250th anniversary.

According to an interview with Secretary Duffy, he spent part of seven months on a road trip with his family to celebrate America's 250th anniversary.³ The trip was filmed as part of a reality series called "The Great American Road Trip" that is set to air on YouTube ahead of the country's 250th anniversary celebration. Secretary Duffy appeared on Fox & Friends in his official capacity with his wife to promote the project.⁴ When host Brian Kilmeade said: "So, Sean, as Transportation Secretary, I assume this was your idea", Secretary Duffy responded affirmatively, stating, "So I wanted to lean into America's 250th birthday. Rachel and I actually met on a road trip on a reality TV show. And so, over the course of seven months we just kind of found these moments where I might be able to do some work, I could take the kids with me, do a road trip. ... The president kicked us off."⁵

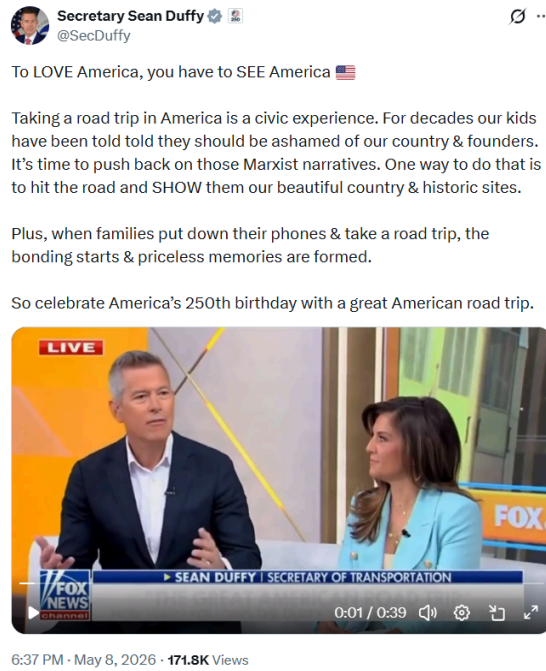
While the secretary did not explain whether the trip and the reality series were conducted in his official capacity or his personal capacity, there are several indicators that it was the former and not the latter. For example, Secretary Duffy tweeted his Fox & Friends interview about the project from his official @SecDuffy account on X, stating "Taking a road trip in America is a civic experience. For decades our kids have been told told [sic] they should be ashamed of our country & founders. It's time to push back on those Marxist narratives."⁶

³ *Id.*

⁴ *Id.*

⁵ *Sean and Rachel Campos-Duffy Launch 'The Great American Road Trip,'* Fox News (May 8, 2026), <https://www.foxnews.com/video/6394970597112>.

⁶ Secretary Sean Duffy (@SecDuffy), X (May 8, 2026, at 6:37 pm) <https://x.com/SecDuffy/status/2052880512596013312>.



In addition, a promotional video for the trip is featured on the Department of Transportation's official YouTube channel and the Department of Transportation logo appears in the corner of the video.⁷ The video features a visit by Secretary Duffy and his family to visit President Trump in the Oval Office, visits with members of the military in uniform, visits to National Park Service sites with government officials in uniform, as well as a visit with Secretary of the Interior Doug Burgum in his official capacity.⁸ Despite indications that the road trip was an official endeavor by the Department of Transportation, a spokesperson for the agency stated, "Production costs were paid for by the Great American Road Trip, Inc. — not taxpayers."⁹



⁷ US Dep't of Transp. and The Great American Road Trip, *Who Are We? The Great American Road Trip*, YouTube (May 8, 2026), <https://www.youtube.com/watch?v=QPNmTYUi9DY>.

⁸ *Id.*

⁹ Hartmann, *supra* note 1.



The website for “The Great American Road Trip” names as sponsors a number of private companies including several in the transportation industry, such as Royal Caribbean Group, Boeing, Toyota, Enterprise and United Airlines.¹⁰ The DOT promotional video also includes a prominent feature of the Toyota logo—a Japanese car company that both sponsored “The Great American Road Trip” and is regulated by the Department of Transportation—on one of the cars used by Secretary Duffy on the trip.¹¹ The “Great American Road Trip” nonprofit, funded partly by industry, is led by Tori Barnes, “a recent lobbyist for the U.S. Travel Association who previously worked in government relations for General Motors.”¹² Apparently the show was created in partnership with producers from Duffy’s season of *The Real World*.¹³



DOT has responsibility for regulating the transportation industry including automotive companies, airlines and airplane manufacturers.¹⁴ For example, in 2019, DOT announced that Toyota agreed to pay \$32.425 million in civil penalties as the result of two separate investigations

¹⁰ *Sponsors*, The Great American Road Trip, <https://greatamericanroadtrip.org/#sponsors> (accessed May 9, 2026).

¹¹ US Dep’t of Transp. and The Great American Road Trip, *supra* note 7.

¹² Michael Scherer, *Trump’s Cozy Transportation Secretary*, The Atlantic (Apr. 2, 2026), https://www.theatlantic.com/politics/2026/04/trump-sean-duffy-transportation-ethics/686649/?gift=nHf7iWmpOKBdlkwz68mfUDLHJE_uNBPcdrTfowyIsJE&utm_source=copy-link&utm_medium=social&utm_campaign=share.

¹³ Brooke Migdon, *The Real World Alum Sean Duffy Filmed New Reality Series Over Past 7 Months While Serving as Transportation Secretary*, People (May 8, 2026), <https://people.com/the-real-world-alum-sean-duffy-spent-7-months-filming-new-reality-series-while-serving-as-transportation-secretary-11970932>.

¹⁴ Dep’t of Transp. Act, Pub. L. No. 89-670, § 9, 80 Stat. 931, 944-47 (1966).

May 11, 2026

Page 5

led by DOT into the automaker's handling of auto recalls in violation of the National Traffic and Motor Vehicle Safety Act.¹⁵ In March 2019, then-Secretary Elaine Chao asked that, as part of an ongoing review of factors related to aviation certification, the Inspector General conduct a formal audit of the certification process for the Boeing 737-MAX 8 aircraft.¹⁶ That same year, the department fined United Airlines “for providing inaccurate information to passengers about how much compensation they could potentially receive for lost, damaged or delayed baggage on international flights.”¹⁷ The department also tracks and reports crime against U.S. nationals on cruise lines including Royal Caribbean.¹⁸

Following public reports about Secretary Duffy and his family’s participation in the “The Great American Road Trip,” a department spokesperson added that “the Secretary and his family do not receive **any financial compensation**.”¹⁹ In response to increasing public criticism, Secretary Duffy claimed in a post on X that “[p]roduction costs were paid for by the Great American Road Trip Inc., not taxpayers. Zero taxpayer dollars were spent on my family” adding that “[n]either myself nor my family received a salary or production royalties,” and that the series was filmed on weekends and school breaks for his children.²⁰ Finally, he stated that, “[c]areer ethics and budget officials at the Department of Transportation reviewed and approved both my participation and individual travel in accordance with federal rules.”²¹ To date, the department has not explained whether The Great American Road Trip, Inc. or its corporate sponsors paid for travel, hospitality or any gifts related to the trip or if the secretary solicited any funds for the project.

II. Relevant law

A. Gifts rules

The federal gift ban states, that, except under a limited set of circumstances, no officer or employee of the executive branch shall solicit or accept anything of value from a person either “seeking official action from, doing business with, or (in the case of executive branch officers and employees) conducting activities regulated by, the individual’s employing entity” or “whose interests may be substantially affected by the performance or nonperformance of the individual’s official duties.”²²

¹⁵ *Toyota Motor Corp will Pay \$32.425 Million in Civil Penalties as the Result of Two Department of Transportation Investigations*, US Dep’t of Transp. (Aug. 1, 2019), <https://www.transportation.gov/briefing-room/toyota-motor-corp-will-pay-32425-million-civil-penalties-result-two-department>.

¹⁶ *U.S. Secretary of Transportation Asks Inspector General to Ensure Audit of Boeing 737-MAX 8 Certification is Part of Review*, US Dep’t of Transp., (Mar. 19, 2019), <https://www.transportation.gov/briefing-room/dot1419>.

¹⁷ *DOT Fines United Airlines for Providing Inaccurate Information About Baggage Liability*, US Dep’t of Transp., (Aug. 1, 2019), <https://www.transportation.gov/briefing-room/dot-fines-united-airlines-providing-inaccurate-information-about-baggage-liability>.

¹⁸ Jim Walker, *Cruise Ship Crime Report – Q4 2025: Royal Caribbean Leads All Cruise Lines*, Jim Walker’s Cruise Line News (Jan. 21, 2026), <https://www.cruiselawnews.com/2026/01/articles/crime/cruise-ship-crime-report-q4-2025-royal-caribbean-leads-all-cruise-lines/>.

¹⁹ Hartmann, *supra* note 1 (emphasis added).

²⁰ Secretary Sean Duffy (@SecDuffy), X (May 9, 2026, at 2:05 pm) <https://x.com/SecDuffy/status/2053174586246631580>.

²¹ *Id.*

²² 5 U.S.C. § 7353.

According to guidance provided to department employees based on federal law and executive orders, “DOT employees are required to adhere to the Standards of Ethical Conduct for Employees of the Executive Branch. These standards are set out in Executive Order 12731 of October 17, 1990.”²³ DOT employees are admonished that “[a]ll executive branch employees hold their Government positions as a public trust and the American people have a right to expect that all employees will place loyalty to the Constitution, laws, and ethical principles above private gain. Employees fulfill that trust by adhering to the Standards of Ethical Conduct.”²⁴ The Standards of Ethical Conduct that govern all executive branch employees including Secretary Duffy “[p]rohibit an employee from accepting gifts from sources seeking official action from, doing business with, or conducting activities regulated by the agency, or from sources with interests substantially affected by the employee’s performance of duty.”²⁵ Officials cannot use their public office for their own private gain, or the gain of any person or organization with which they are personally associated.²⁶ Additionally, the rules also generally bar officials from soliciting or accepting gifts, i.e., anything of value, given to them because of their official position.²⁷ For purposes of federal ethics rules, travel expenses—including costs of transportation, lodging, meals, etc. during a trip—are included in the definition of gifts.²⁸

Federal gifts rules prohibit indirect or conduit gifts from prohibited sources. An employee may not accept a gift indirectly if they are prohibited from accepting it directly from a “prohibited source” such as lobbyists, contractors or those seeking official action.²⁹ A gift is considered a “conduit” gift if it is given to another person in the employee’s family “with the employee’s knowledge and acquiescence” or to another person or organization “on the basis of designation, recommendation, or other specification by the employee” himself.³⁰ Furthermore, even if a gift isn't technically a “conduit” gift, Office of Government Ethics rules advise employees to decline gifts if acceptance would cause a reasonable person to question their impartiality.³¹

B. Travel rules

Because federal officials’ travel is paid for by taxpayer funds, federal rules also proscribe improper use of travel resources for personal benefit, meaning that federal officials’ travel on agency aircraft generally must be for official purposes—to conduct agency business or other “required use travel.”³² Federal agencies are authorized to “pay only those [travel] expenses essential to the transaction of official business” and cannot pay for any costs incurred by “circuitous routes, delays, or luxury accommodations or services that are unnecessary or unjustified in the performance of official business.”³³ Government regulations permit officials to combine official and personal travel, but, to any extent that a trip is extended for personal purposes or includes events not related to agency business, the traveler must incur the cost of the

²³ *Ethics*, US Dep’t of Transp., <https://www.transportation.gov/ethics>, (accessed May 9, 2026).

²⁴ *Id.*

²⁵ *Id.*

²⁶ 5 C.F.R. § 2635.702.

²⁷ 5 C.F.R. § 2635.202.

²⁸ 5 C.F.R. § 2635.203(b).

²⁹ 5 C.F.R. § 2635.203(f).

³⁰ *Id.*

³¹ 5 C.F.R. § 2635.201(b).

³² See 41 C.F.R. § 301-10.260; OMB Circular No. A-126, *Improving the Management and Use of Government Aircraft*, at § 7 (May 22, 1992), <https://whitehouse.gov/wp-content/uploads/2017/11/Circular-a-126.pdf>.

³³ 41 C.F.R. § 301-2.2.

May 11, 2026

Page 7

additional length of the itinerary and related events.³⁴ In at least one example, the General Services Administration Board of Contract Appeals made clear that a federal official who orchestrated their official travel to accommodate personal interests on the trip did not comply with federal travel rules, explaining that employees cannot use government travel as “a certificate for [an] all-expenses-paid vacation.”³⁵

C. Endorsement of products

Federal executive branch officials are also bound by standards of ethical conduct that prohibit using their office for personal gain, protecting and conserving government property so that it is used only for approved purposes and avoiding any behavior that would give an appearance of acting illegally or unethically.³⁶ The Standards of Ethical Conduct bar employees from using their official position and authority not only for their own personal gain, but likewise “for the private gain of friends, relatives, or persons with whom the employee is affiliated in a nongovernmental capacity.”³⁷ They also prohibit executive branch officials 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.”³⁸ Furthermore, officials are prohibited from “us[ing] or permit[ing] the use of their Government position or title or any authority associated with their public office to endorse any product, service, or enterprise.”³⁹

The Office of Government Ethics (“OGE”) guidance and opinions consistently advise that such use is a violation of the ethical standards.⁴⁰ 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 do so in a book review published in a newspaper.”⁴¹ OGE applied this rule to White House Special Counselor to the President 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.⁴² 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.⁴³ Secretary Duffy’s appearance in and promotion of a video in his official capacity that prominently features a Toyota vehicle as part of a project sponsored by the company, implies his support of Toyota, a Japanese car company, and its product.

³⁴ See 41 C.F.R. § 301-10.8 (stating that an official is responsible for any additional costs to a trip that is planned to accommodate his personal convenience).

³⁵ *In re Gilreath*, GSBICA No. 16119-TRAV, 03-2 B.C.A. (CCH) ¶ 32391 (July 16, 2003).

³⁶ 5 C.F.R. § 2635.101.

³⁷ 5 C.F.R. § 2635.702.

³⁸ 5 C.F.R. § 2635.702(b).

³⁹ 5 C.F.R. § 2635.702(c).

⁴⁰ Letter from Walter M. Shaub, Jr., Director, Off. of Gov’t Ethics, to Stefan C. Passantino, Deputy Counsel to the President and Designated Agency Ethics Official (Feb. 13, 2017), <https://tinyurl.com/598u3nyf>.

⁴¹ 5 C.F.R. § 2635.702(c), ex. 4.

⁴² 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., *supra* note 40.

⁴³ Letter to a Designated Agency Ethics Official dated October 30, 2002, OGE Informal Advisory Letter 02x9, <https://tinyurl.com/5n7jnvdy>; Letter to an Administrative Law Judge dated July 19, 2001, OGE Informal Advisory Letter 01x6, <https://tinyurl.com/2awwsv2u>.

III. Potential violations and areas for investigation

Secretary Duffy's participation in a promotion of the privately sponsored "Great American Road Trip" raises questions about whether his official time is being used for public purposes, whether he accepted or solicited gifts from companies with businesses subject to regulation by the Department, the appropriate use of government travel and the potential promotion of private products. Therefore, CREW asks DOT OIG to use its authority to investigate any misuse of federal funds and staff or whether the secretary violated the standards of ethical conduct or other federal ethics laws by his participation in the privately sponsored promotional road trip with his family, as well as whether sufficient internal controls are in place to prevent future violations.

Areas for investigation include:

1. Did Secretary Duffy follow proper protocol and receive necessary approval for participation in "The Great American Road Trip"?
2. Did Secretary Duffy's decision to work with his former reality television production company to film this trip comply with his obligation to not use his official position for the private gain of his personal associates?
3. Were any taxpayer funds used to support Secretary Duffy's participation and promotion of "The Great American Road Trip"? If so, how much funds and staff time were used and who authorized its use?
4. Who paid for Secretary Duffy and his family's participation in the "The Great American Road Trip"? Did Secretary Duffy or his family accept any travel, hospitality or other gifts as part of "The Great American Road Trip"? If so, were those gifts and funds provided by entities with business before the Department?
5. Who paid for other government officials' participation in the "The Great American Road Trip" show and production? Did any other government employees accept any travel, hospitality or other gifts as part of "The Great American Road Trip"? If so, were those gifts and funds provided by entities with business before the Department? (If DOT OIG discovers potential areas of investigation that involve employees at other federal agencies, please refer them to the appropriate agency OIG.)
6. Secretary Duffy claims that he received ethics advice and clearance from agency ethics officials related to his participation in or promotion of the trip. Were ethics officials provided accurate and complete information about the trip, its funding and the project's corporate sponsors? Did he follow said guidance?
7. Did Secretary Duffy or his family pay for or reimburse the required expenses for his trip as well as any other travel (including lodging, meals, etc.) that was for personal purposes?
8. Did any aspect of Secretary Duffy's trip or its planning violate the letter or spirit of any federal law or regulations, agency or ethics guidance or any other rules governing the conduct of DOT employees? Does OIG have any recommendations for reform based on these events?

IV. Conclusion

While everyday Americans continue to struggle with the cost of gas and amidst concerns about airline safety, Secretary Duffy embarked on a months-long promotional tour of America with his family that appears to have been funded in part by companies that are directly under the

May 11, 2026

Page 9

regulatory authority of his agency.⁴⁴ The department has claimed that taxpayer funds were not used to pay for the trip, but Secretary Duffy has used government resources to promote the project. In addition, accepting travel from companies with business before DOT potentially implicates even more significant corruption and misconduct concerns. Public trust requires that the DOT OIG thoroughly investigate Secretary Duffy's participation in this project. A complete investigation and audit of proper protocols and financial accounting will ensure integrity in the use of official resources and protection of public funds, preventing officials' abuse of their positions to seek undue benefits at taxpayers' expense.

CREW greatly appreciates your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sherman', with a long horizontal flourish extending to the right.

Donald K. Sherman
President and Chief Executive Officer

⁴⁴ Will Lennon, *After Months of War with Iran, People Across the US Say They're Feeling the Strain of High Gas Prices*, ABC News (May 8, 2026), <https://abcnews.com/Politics/after-months-war-iran-people-us-feeling-strain/story?id=132760039>; see also Jeffrey Cook & Jon Haworth, *Frontier Airlines Jet Strikes Person on Runway at Denver International Airport: Officials*, ABC News (May 10, 2026), <https://abcnews.com/amp/US/frontier-airlines-jet-reports-striking-individual-walking-runway/story?id=132805804>.