



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 25, 2026

The Honorable Caryl Brzymialkiewicz
Acting Inspector General
Office of Inspector General
U.S. Department of the Interior
1849 C Street NW
Washington, D.C. 20240

Re: Potential federal contracting and ethics violations related to agency contracts for major renovations to National Park Service properties across Washington, D.C. that were reportedly awarded to administration associates

Dear Acting Inspector General Brzymialkiewicz,

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests that the U.S. Department of the Interior’s Office of Inspector General (“DOI OIG”) review agency procedures, operations and decisions related to government contracts for work done on federal properties under the control of the National Park Service. Over the past year, the Trump administration has reportedly awarded federal contracts to the president’s preferred vendors, apparently outside of regular contracting procedures without legal justification for using sole-source contracts that deny the opportunity of fair competition for government contracting opportunities to entities without personal connections. Three prominent projects made without full and open competition – awarded for renovation of the Lincoln Memorial Reflecting Pool, maintenance on Lafayette Park fountains, and demolition and rebuilding of the White House’s East Wing – each involved properties under the control of the National Park Service within DOI.

Public reporting strongly suggests that the process to award these contracts did not conform to normal contracting practices and did not comply with federal contracting requirements or federal ethics laws. CREW therefore requests that your office review the circumstances under which these contracts were approved to determine if the agency or its officials violated federal procurement or ethics rules in any of these examples, including the Federal Acquisition Regulation, the Standards of Ethical Conduct for Executive Branch Employees, and any other relevant legal requirements. CREW also urges your office more broadly to review whether the agency’s contracting process has sufficient internal controls to ensure that contracts are properly categorized and proper procedures are followed, including whether personal associates are being given preferential treatment. A thorough review is necessary to ensure that the public can trust that government officials are following standard operating procedures and all federal legal requirements when awarding valuable contracts for work done on national parks and monuments.

I. Factual Background: Contracts involving work on National Park Service controlled properties have reportedly been awarded without full and open competition and without clear justification that those awards qualify for the rare use of non-competitive government contracting.

In comments he made directly to the press, President Trump announced that the Lincoln Memorial Reflecting Pool would be renovated in advance of the 250th celebrations for the Fourth of July, work for which he claimed he personally chose a contractor who worked for his private business.¹ As detailed below, this was the most recently reported example regarding a trend of public works contracts that appear to have been awarded as sole-source contracts that deny the opportunity for fair competition for other eligible contractors.² This series of examples has garnered attention because of the apparent influence of the president in particular agency contracts, reflecting a need for systemic review to ensure that officials cannot exert undue influence or take advantage of opportunities within DOI's contracting system.

During the press conference announcing renovations to the Reflecting Pool, President Trump indicated that he requested bids from three of his own associates, calling on his "years as a developer, [when he] probably built more than 100 swimming pools in different buildings."³ According to his statements, following discussions with Secretary of the Interior Doug Burgum, the president referred the contractor he used for a swimming pool at one of his properties for the job, stating that the project would be completed in one week at a cost of \$1.5 million.⁴ However, when questioned during a congressional hearing, Secretary Burgum "said he was 'not familiar' with the company" that had been selected for the contract. Burgum unequivocally responded that he was "positive that [DOI] followed all of the required bidding rules."⁵ So, you're emphasizing the word 'no-bid' like something nefarious has happened, and I reject that thesis."⁶

Despite the president's initial justification that his preferred contractor would finish the work in one week for less than \$2 million dollars, the contract deadline was extended and its cost estimate increased repeatedly.⁷ It was ultimately concluded after two months, at a cost of over \$14 million.⁸ DOI acknowledged that the construction took eight weeks to complete, eight times the president's promised timeline, and that the algae that the president had been trying to eliminate

¹ PBS NewsHour, *WATCH: Trump announces Lincoln Memorial Reflecting Pool renovation, touting swimming pool experience* (YouTube, Apr. 23, 2026), <https://www.youtube.com/watch?v=UeUqcRB7lEO>.

² See, e.g., David A. Fahrenthold & Luke Broadwater, *The No-Bid Contract That Is Turning Washington's Reflecting Pool Blue*, N.Y. Times (May 11, 2026), <https://tinyurl.com/44t3rmhd>; David A. Fahrenthold, Luke Broadwater & Andrea Fuller, *Firm Building Trump's Ballroom Got a Secret No-Bid Contract for a Nearby Job*, N.Y. Times (Apr. 27, 2026), <https://tinyurl.com/3h9yjde3>; Heather Hollingsworth, John Hanna & Nicholas Ingram, *AP details no-bid contracts awarded to politically connected companies for immigration detention*, AP (June 27, 2025), <https://tinyurl.com/mrybhm4w>.

³ PBS NewsHour, *supra* n.1.

⁴ *Id.*

⁵ Max Rego, *Democrat Neguse presses Burgum on reflecting pool, \$13M 'no-bid' contract*, The Hill (May 13, 2026), <https://tinyurl.com/resy8k73>.

⁶ *Id.*

⁷ See David A. Fahrenthold & Luke Broadwater, *Reflecting Pool repairs to cost \$13.1 million. Trump had promised \$1.8M*, N.Y. Times (May 11, 2026), <https://tinyurl.com/4b7swmc6>.

⁸ Linda Qiu, *Fact-Checking Trump's Justifications for His Makeover of Washington*, N.Y. Times (June 12, 2026), <https://tinyurl.com/4tcrbtdm>; Contract Summary from Department of the Interior to Atlantic Industrial Coatings LLC, USASPENDING.gov, <https://tinyurl.com/3acp4z7k> (last visited June 14, 2026).

with the renovation had returned.⁹ Despite the Department claiming that “President Donald J. Trump is an expert builder who has fixed the Reflecting Pool for good unlike the failed and extremely costly attempt by Obama and Biden,” the hastily justified project exceeded both the original timeline and cost by seven times, without sufficiently correcting the alleged problem justifying its urgent need.¹⁰ The Trump administration has given divergent explanations for the pool’s aesthetic issues, with the President later claiming “vandalism” was to blame.¹¹

According to public reporting, President Trump likewise played a direct role in selecting a contractor to complete renovations to public fountains located in Lafayette Park, directly across from the White House.¹² The president announced the project in April 2026, although news reports indicated that “the Trump administration secretly gave the company a no-bid contract” for the work in January 2026 after selecting the same company to build the ballroom intended to replace the East Wing of the White House.¹³

According to that reporting, the Biden Administration estimated that the work to repair the fountains would cost \$3.3 million, but the Trump Administration initially agreed to pay nearly \$12 million and later revised the contract to cost \$17.4 million.¹⁴ As part of this public reporting, the New York Times “obtained internal Park Service documents showing how the contract was awarded” and following review by government contracting experts, reported that “those documents revealed that the government had repeatedly used unusual procedures to bypass competition for the project and increase the price it expected to pay.”¹⁵ In addition to two initial increases of 27% and 24% that the Park Service attributed as adjustments for inflation even though they exceeded the Department of Labor’s reported rate of inflation, DOI “increased its estimate by another 50 percent [...] attribut[ing] the increase to a ‘schedule compression factor.’”¹⁶ In other words, the agency spent millions in extra taxpayer funds based on the “urgency [...] to ensure this project is done well ahead of America’s 250th anniversary” only to require additional renovations following the original project’s failure to achieve the president’s intended goal.¹⁷

These examples illustrate a concerning trend involving the president’s involvement in personally selecting contractors for agency projects and the repeated justification of urgency.¹⁸ The approach has meant that “the Trump administration’s contractors finished the project before a federal judge could rule” on the legality of the processes.¹⁹ Doing so likewise has avoided the

⁹ Maura Judkis & Dan Diamond, *Algae forms in the Reflecting Pool. It’s ‘residual,’ Trump officials say*, Washington Post (June 11, 2026), <https://tinyurl.com/5fs4jj92>.

¹⁰ *Id.*; Elise Spenner, *Park Service continues to battle algae in renovated Reflecting Pool*, ABC News (June 17, 2026), <https://tinyurl.com/5y6b9ndt>; Anna Betts, *Trump acknowledges ‘real problems’ at reflecting pool after \$14m makeover, blaming ‘vandalism,’* The Guardian (June 20, 2026), <https://tinyurl.com/3frtm45v>.

¹¹ Betts, *supra* n.9.

¹² David A. Fahrenthold, Luke Broadwater & Andrea Fuller, *Firm Building Trump’s Ballroom Got a Secret No-Bid Contract for a Nearby Job*, N.Y. Times (Apr. 25, 2026), <https://tinyurl.com/3h9yjde3>.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*; Maria Ramirez Uribe, *Was the Reflecting Pool vandalized? Experts cast doubt on Trump’s claims*, PBS News (June 23, 2026), <https://tinyurl.com/4cctp2rn>.

¹⁸ Dan Diamond & Maura Judkis, *Trump says Reflecting Pool shows his plan for D.C., disturbing critics*, Wash. Post (June 6, 2026), <https://tinyurl.com/mtn86cyf>.

¹⁹ *Id.*

“web of federal commissions, planning boards and laws requiring public input, [that create] checks on any president seeking to transform the city.”²⁰

II. Relevant law: Federal contracting and ethics law incorporate principles of fairness reflected in prohibitions against preferential treatment of personal associates.

Federal contracting is a process through which agencies buy goods and services from entities in the private sector to assist in meeting agency missions and is governed by rules known as the Federal Acquisition Regulations (“FAR”). These rules are meant “to deliver on a timely basis the best value product or service to the customer, while maintaining the public’s trust and fulfilling public policy objectives.”²¹ Beyond these rules governing the contracting process itself, federal officials are individually responsible for adhering to federal ethics rules that are likewise intended to ensure that the officials serve the public interest and adhere to all laws and ethical principles above private gain.²²

A. Federal Acquisition Regulation (FAR)

Under the Competition in Contracting Act, government contracting decisions are by default to be made through “full and open competition,”²³ and its implementing regulation (the FAR) “prescribes policies and procedures to promote full and open competition in the acquisition process...”²⁴ Contracting officers must maintain that purpose “in soliciting offers and awarding Government contracts” and agency officials must “provide for full and open competition through use of the competitive procedure(s) [...]”²⁵

The FAR recognizes that in some instances statutory requirements provide for “set-asides,” allowing that “contracting officers may set aside solicitations to allow only [certain groups identified by in relevant statutes] to compete.”²⁶ These provisions reflect public policies, enacted through the democratic process, to provide assistance to certain private sector entities but only categorically, not through individual favor.

Under very limited conditions, agencies may exercise authority to contract without full and open competition,²⁷ but doing so is never justified by “lack of advance planning or concerns related to the amount of funds available (e.g., funds will expire).”²⁸ The Government Accountability Office reviewed a contracting decision in which it “recognize[d an] abbreviated contracting schedule [...] driven by expectations and mandates from higher echelons [in the agency], but determined that the limited timeframe “was the direct result of unreasonable actions and

²⁰ *Id.*

²¹ FAR 1.102(a).

²² 5 C.F.R. § 2635.101(a).

²³ 41 U.S.C. § 3301.

²⁴ FAR 6.000.

²⁵ FAR 6.101.

²⁶ *See, e.g.*, FAR 6.203. *See also* FAR 6.204 (section 8(a) participants), 6.205 (HUBZone small business concerns), 6.206 (service-disabled veteran owned small business concerns), 6.207 (women-owned small business concerns), 6.208 (local firms during major disasters or emergencies).

²⁷ 10 U.S.C. §§ 2304, 3204.

²⁸ 10 U.S.C. § 2304(f)(5); FAR 6.301(c).

acquisition planning [...] to the extent [the agency] engaged in any acquisition planning at all.”²⁹ In instances in which an agency awards a contract without full and open competition, the FAR generally requires contracting officers to “solicit offers from as many potential sources as is practicable under the circumstances”³⁰ and the contract must identify the specific authority under which it was justified to be noncompetitive.³¹

The full and open competition requirement of federal contracting may be waived only if the agency has specific authority, with one possible example arising “[w]hen the agency’s need for the supplies or services is of such an unusual and compelling urgency that the Government would be seriously injured unless the agency is permitted to limit the number of sources from which it solicits bids or proposals.”³² The contracting rules are drawn so narrowly for this exception that they are meant only to allow the agency to effectively do what’s necessary until the proper competitive protocols could be followed. More specifically, contracts that agencies enter under this exception to the full and open competition requirement cannot exceed the time needed to meet the unusual and compelling circumstances and the time needed “[f]or the agency to enter into another contract for the required goods and services through the use of competitive procedures.”³³

Finally, when an agency awards a contract without full and open competition, it must provide written justification of the award that details “sufficient facts and rationale to justify the use of the specific authority cited” to act outside competitive bidding.³⁴ After the justification is approved in writing,³⁵ it must be made publicly available, within 30 days after the contract is awarded if the justification was based on unusual and compelling urgency.³⁶ Nothing in the FAR authorizes the president to award sole source contracts or for agencies to award government contracts based on the president's recommendation or personal preference.

B. Standards of Ethical Conduct for Executive Branch Employees

Executive branch employees are required to fulfill their official duties serving the public trust, following the federal laws and ethical principles “[t]o ensure that every citizen can have complete confidence in the integrity of the Federal Government.”³⁷ Employees are barred from working on any matters, including contracts, that would conflict with their own personal financial interests. Specifically, officials must “take appropriate steps to avoid an appearance of loss of impartiality in the performance of their official duties.”³⁸ Officials meet that requirement by recusing themselves from any contract review or award in which they have a covered relationship with one of the parties to the contract or with someone who represents a party to the contract.³⁹

²⁹U.S. Gov’t Accountability Off, WorldWide Language Resources, Inc.; SOS International Ltd., B-296984, B-296984.2, B-296984.3, B-296984.4, B-296993, B-296993.2, B-296993.3, B-296993.4 (Comp. Gen. Nov 14, 2005), <https://perma.cc/2Q2Y-34D6>.

³⁰ FAR 6.301(d).

³¹ FAR 6.301(b).

³² FAR 6.302-2(a)(2). *See also* 41 U.S.C. § 253(c)(2).

³³ FAR 6.302-2(d); 10 U.S.C. § 3204(c)(1).

³⁴ *See* FAR 6.303.

³⁵ FAR 6.304.

³⁶ FAR 6.305

³⁷ 5 C.F.R. § 2635.101(a).

³⁸ 5 C.F.R. § 2635.501(a).

³⁹ 5 C.F.R. § 2635.502(a).

Even if they technically have no conflicting relationship, officials nonetheless are required to recuse from matters if “the circumstances would cause a reasonable person with knowledge of the relevant facts to question their impartiality in the matter.”⁴⁰

The standards of conduct also prohibit officials from misusing their office and authority for their own private gain, “or for the private gain of friends, relatives, or persons with whom the employee is affiliated in a nongovernmental capacity.”⁴¹ The bar on using one’s official office for private gain applies regardless of whether it directly benefits the official. To comply with the rule, officials cannot take any official action that offers a personal associate an advantage or access that is unavailable to those who do not have such inside connections.⁴²

III. Potential violations and areas for investigation

The awarding of contracts to friends of the president or preferred vendors raises questions about whether government decisions to direct taxpayer funds to particular private businesses are being driven by fairness principles imbued in federal contracting law. Therefore, CREW asks DOI OIG to use its authority to review any misconduct by agency officials who have been involved in these contract processes and the adequacy of agency procedures to ensure that the authorized officials are making decisions to award agency contracts without undue political influence or other deviations from proper protocol and procedure, as well as whether sufficient internal controls are in place to prevent future violations.

Areas for investigation include:

1. Was DOI aware of the search for contractors to complete work at any projects on property controlled by NPS prior to the selection of the contractor that was ultimately awarded the contract?
2. Were contracts, including but not limited to those for the Reflecting Pool, Lafayette Park, and the East Wing of the White House, awarded pursuant to FAR requirements, and were decisions documented appropriately?
3. Did DOI officials make any determinations prior to the search or selection regarding whether these contracts were necessarily noncompetitive?
4. Did DOI officials follow proper protocol and receive any necessary approvals when awarding these contracts?
5. Were DOI contracting officials permitted to perform their duties without political pressure in the process of pursuing these contracts?
6. Were any White House officials involved with the contracting decisions and were any DOI employees overruled or retaliated against?
7. Did the White House give DOI employees any direction on how to explain these contracts or problems with the Reflecting Pool including blaming vandalism?
8. Did the Departmental Ethics Office provide any ethics advice to political appointees or career staff involved in these contracts and did official actions comply with that advice?
9. Did any aspect of these contracts and the award process violate the letter or spirit of any federal law or regulations, agency or ethics guidance or any other rules

⁴⁰ 5 C.F.R. § 2635.502(a).

⁴¹ 5 C.F.R. § 2635.702.

⁴² *Id.*

governing federal contracts for work done on NPS properties? Does OIG have any recommendations for reform based on these events?

IV. Conclusion

While government agencies have experienced severe personnel and budget cuts at the behest of saving taxpayer dollars, DOI apparently approved the selection of personal associates of the administration to complete federal contract work on historic and iconic national properties at costs far exceeding the bid amounts. In the example of the Reflecting Pool renovation contract, the agency contradicted the White House announcement that the president selected the contractor and maintained that it complied with “all the required bidding rules.”⁴³ Public trust – driven by concerns raised in the examples cited in this letter, as well as any others that simply may not have been publicly reported – demands transparency of the processes and actions leading to these contracting awards and requires a thorough review of agency practices and procedures. A complete review of proper protocols will ensure integrity in the process of deciding which private businesses have the opportunity to earn the business of one of the government’s largest agencies rather than administration officials using their positions to funnel business to their personal associates at taxpayers’ expense.

CREW greatly appreciates your prompt attention to this matter.

Sincerely,



Donald K. Sherman
President and Chief Executive Officer

⁴³ Alex Woodward, *Trump's 'pool guy' has nothing to do with Lincoln Memorial paint job, Interior Secretary admits, as he defends no-bid \$13M contract*, The Independent (May 13, 2026), <https://tinyurl.com/ya38evfx>.