CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

August 21, 2026

The Honorable Michael R. Esser
Deputy Inspector General
ATTN: OIG Hotline
OPM Office of the Inspector General
1900 E Street NW Room #6400
Washington, D.C. 20415-1100

Re: Request for investigation of OPM Director Scott Kupor's financial conflicts of interest

Dear Deputy Inspector General Esser,

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the U.S. Office of Personnel Management's ("OPM") Office of Inspector General ("OIG") investigate potential violations of the criminal conflict of interest laws, the Standards of Ethical Conduct for Executive Branch Employees and any other relevant violations of federal law related to Director Scott Kupor's financial interest in a company that he was simultaneously promoting as a partner with OPM's U.S. Tech Force ("Tech Force") initiative. Federal law bans agency officials from working on matters in which they have a financial interest, including stock ownership. Federal regulations also direct employees to avoid participating in agency matters that create an appearance that decisions are driven not by the agency's mission and public interest, but by personal financial interests of agency staff.

CREW urges OPM OIG to investigate Director Kupor's participation in OPM matters involving Robinhood Markets Inc. and any other companies in which he held stock while developing and promoting partnerships related to the Tech Force program. Given the Director's apparent interest in advancing public-private partnerships like Tech Force in his role at OPM, the agency needs to ensure that there is a rigorous process in place to ensure that he divests of any conflicting assets he may hold.

Factual Background

In December 2025, OPM launched Tech Force as part of an administration initiative to recruit technologists into the federal government.[1] According to its website, OPM describes Tech Force as "an elite group of ~ 1,000 technology specialists hired by agencies to accelerate

[1] Madison Alder & Miranda Nazzaro, *OPM launches Tech Force to recruit technologists to government*, Fedscoop (Dec. 15, 2025), https://fedscoop.com/opm-launches-tech-force-recruit-technologists-government/.

artificial intelligence (AI) implementation and solve the federal government's most critical technological challenges."[2] Through the program, OPM is partnering with private sector companies that are "providing technical training resources, mentorship programs, nominating employees to do stints of government service, and committing to consider Tech Force alumni for employment after their government service."[3] The Tech Force program purportedly is designed to recruit individuals who will serve two-year terms of employment in the federal workforce, and "serve as a recruiting platform post-employment."[4] It advertises "additional benefits" for participants that include "a pathway to continued public service or private sector careers."[5] Through this model, program participants "report[] directly to agency leadership while receiving technical training from industry partners."[6]

In December 2025, Director Kupor participated in a media interview in which he discussed OPM's "partnership with about 25 of the tech companies that you all know and love [including] Coinbase, Robinhood, Databricks, Snowflake, NVIDIA, xAI, [and] Open AI" as part of Tech Force.[7] Director Kupor has promoted the Tech Force initiative on behalf of the agency, explaining that it will be a career development program that will include "engagement with our private sector partners" with the goal of returning participants to careers in the private sector.[8] According to Director Kupor, OPM created Tech Force with the "expect[ation] that many of those people will go into the private sector and take the skills they learn in government and have fantastic private sector careers."[9] OPM's establishment of the Tech Force program appears to undermine, not support, OPM's mission to "lead[] federal agencies in building merit-based, accountable, and modern workforce systems that attract and *retain* top talent to meet America's toughest challenges."[10]

The program contemplates that private sector companies can nominate candidates for the program, who will temporarily enter government service as paid federal employees, then may return to those employers.[11] After its initial launch including Robinhood and other companies, Tech Force later expanded to include companies such as Cisco, Cognition AI,

---

[2] *Tech for the American People, Frequently Asked Questions: What is the US Tech Force (Tech Force)?*, www.techforce.gov (last visited Aug. 18, 2026).
[3] *Tech for the American People, Frequently Asked Questions: How do private sector companies partner with Tech Force?*, www.techforce.gov (last visited Aug. 18, 2026).
[4] *Supra What is the US Tech Force (Tech Force)?*, note 2.
[5] *Tech for the American People, Frequently Asked Questions: Are there any other benefits?*, www.techforce.gov (last visited Aug. 18, 2026).
[6] Vismaya V, *Coinbase, Robinhood Join Newly Formed 'Tech Force' to Direct Talent to US Government*, decrypt (Dec. 16, 2025), https://decrypt.co/352515/coinbase-robinhood-join-newly-formed-tech-force-to-direct-talent-to-us-government.
[7] Dave Levinthal, *OPM Director Scott Kupor Publicly Touted Robinhood. He's Also an Investor*, NOTUS (July 30, 2026), https://www.notus.org/money/scott-kupor-robinhood-investor-opm.
[8] *ICYMI: OPM Director Kupor Discusses Tech Force on Fox Business*, U.S. Off. of Personnel Mgmt. (last visited Aug. 19, 2026), https://www.opm.gov/news/news-releases/opm-director-kupor-discusses-tech-force/.
[9] *Id*.
[10] *Mission & History*, U.S. Off. of Personnel Mgmt. (last visited Aug. 9, 2026), https://www.opm.gov/about-us/mission-history/ (emphasis added).
[11] *Tech for the American People, Frequently Asked Questions: How do candidates nominated by a private sector company participate? Do they retain their private sector employment?*, www.techforce.gov (last visited Aug. 29, 2026).

Scale AI and others, as OPM's release says "helping create paths for Tech Force alumni into the private sector."[12] It is unclear what ethical guardrails have been put in place by Tech Force to address revolving door concerns and ensure compliance with applicable post-government employment restrictions under 18 U.S.C. § 207. One public interest advocate has raised revolving door concerns "leading from government to business after the participants have soaked up what they can about government ins and outs" noting that Tech Force "goes one better than most revolving doors by blurring the lines of what is government and what is private enterprise."[13]

While Tech Force continues to partner with Robinhood and other private sector partners, Director Kupor has held financial interests in the company. In June 2026, he filed periodic transaction reports, identifying sales of stock that he had been holding in Robinhood Markets Inc.[14] Because the sales values are reported as a range, the aggregate value of the sales was at least $1.7 million and could have measured up to $3.5 million.[15]

As part of his confirmation process, Director Kupor submitted an ethics agreement outlining his obligations related to his financial interests under federal ethics rules.[16] Although the agreement did not include an explicit requirement that he divest Robinhood stocks, it acknowledges Director Kupor's general obligations under criminal conflict of interest laws and specific requirements of the Standards of Ethical Conduct for Employees of the Executive Branch, including impartiality rules, each of which requires his recusal from matters that may arise in which he retains financial interests.[17] An OPM spokesperson has asserted that the ethics review of Director Kupor's financial report during confirmation did not require divestiture of Robinhood "since OPM has no financial relationship with [the] company."[18]

Relevant Law

Director Kupor's ownership of stock in a company that is part of a major initiative launched by OPM and that he publicly touted as part of the agency's rollout raises significant questions about his compliance with federal ethics statutes and regulations. His actions suggest that he has participated in agency decisions and actions that involve at least one company in which he held a financial interest and highlights concerns about compliance

---

[12] *OPM Expands US Tech Force With New Industry Partnerships*, U.S. Off. of Personnel Mgmt., (last visited Aug. 9, 2026), https://www.opm.gov/news/news-releases/opm-expands-us-tech-force-with-new-industry-partnerships/.

[13] Jeff Hagan, *Trump's Public/Private Situationships,* In the Public Interest (Feb. 13, 2026), https://inthepublicinterest.org/trumps-public-private-situationships/.

[14] U.S. Off. of Gov't Ethics, *Executive Branch Personnel Public Financial Disclosure Report: Periodic Transaction Report for Scott Aaron Kupor (OGE Form 278-T)* (June 22, 2026), https://static.notus.org/6e/b2/ae5751e94c7c8f4914ae1f8c81e8/scott-a-kupor-06-22-2026-278t1.pdf.

[15] *Id.*

[16] Letter from Scott Kupor, Dir. of U.S. Off. of Personnel Mgmt. to Andrew Kloster, Designated Agency Ethics Official (Apr. 1, 2025), https://static.notus.org/15/fd/e4692cc54dffb4df16298e04073e/kupor-scott-finalea.pdf.

[17] *Id.*

[18] *Supra* Levinthal, note 7.

with requirements that federal officials do not use their authority to influence their personal financial holdings.

Federal ethics laws prohibit officials' use of their position and government resources to promote private interests, specifically in any way that would affect their own financial interests. The criminal financial conflict of interest statute (18 U.S.C. § 208) bars officials from "participat[ing] personally and substantially as a Government officer or employee, through [any] particular matter, in which, to his knowledge, he [...] has a financial interest."[19] Covered matters include those "that involve deliberation, decision, or action that is focused upon the interests of specific persons, or a discrete and identifiable class of persons" as well as "policy making that is narrowly focused on the interest of a discrete and identifiable class of persons."[20] The Office of Government Ethics has made clear that the statutory prohibition applies even when the "particular matter" at issue relates to regulations that apply only to a particular subset of companies.[21] Section 208 bars an official's participation in agency matters related to their financial interest when their participation is direct, meaning that they are actually involved, and includes supervision of subordinates who are tasked with the matter.[22] Participation in the matter requires that the individual held more than a ministerial role but does not require that the official determined the outcome of the matter itself.[23]

The standards of conduct include a coordinate regulation that likewise prohibits executive branch officials from participating in matters in which it may appear that the official has lost their impartiality in matters involving entities in which they have a financial interest.[24] The ethics rules impose this prohibition based on the appearance of a conflict in recognition that certain circumstances, even if they do not technically violate the rules, raise valid questions in the mind of a reasonable person that the official is not working in the interest of the American public but instead may be driven by their own financial interests.[25] Such motivations underlie the entire code of conduct, reflecting that officials have a duty first and foremost to uphold the public trust and "ensure that every citizen can have complete confidence in the integrity of the Federal Government."[26]

Areas for Investigation

Director Kupor's actions on behalf of OPM suggest that he has overseen the creation and implementation of the Tech Force program while holding a personal financial interest in one of the selected partner companies. This type of financial conflict of interest raises reasonable questions about whether the program participants are properly suited to fulfill the agency's mission or whether the process may have been influenced by personal financial interests and private business interests of the companies involved.

[19] 18 U.S.C. § 208(a).
[20] 5 C.F.R. § 2640.103(a)(1).
[21] 5 C.F.R. § 2640.103(a)(1) example 3.
[22] 5 C.F.R. § 2640.103(a)(2).
[23] *Id*.
[24] 5 C.F.R. § 2635.502(b).
[25] 5 C.F.R. § 2635.502(a).
[26] 5 C.F.R. § 2635.101(a). *See also* 5 C.F.R. § 2635.101(b)(1), (b)(7), (b)(8).

To maintain the integrity of the agency and the public's trust that the agency is operating to fulfill its designated mission, not benefit the financial interest of officials in charge or companies in which they have invested, it is imperative that OIG thoroughly investigate the apparent financial conflicts of interest of Director Kupor and other OPM officials involved in Tech Force, as well as review whether agency decisions related to Tech Force have been made consistent with OPM's mission.

- What was Director Kupor's role in the establishment of Tech Force and the selection of private sector companies that partnered with OPM for the Tech Force program?
- Did Director Kupor hold a financial interest in Robinhood or any of the other participating companies during the time that Tech Force was in planning or implementation stages?
- Did OPM's selection of Robinhood to participate in Tech Force and decision to choose the company as part of its promotion follow the same process as applied to other similarly situated companies? Did the selection process follow proper agency protocols and procedures for nongovernmental partnerships?
- Was Director Kupor involved in the promotion of Robinhood's role in Tech Force in public statements by OPM and its personnel?
- Separate from his Ethics Agreement, did Director Kupor or OPM staff have any communications, including but not limited to seeking or receiving any guidance, with the agency's ethics officials or OGE related to Director Kupor's involvement in Tech Force and his related financial holdings?
- Did Director Kupor follow the advice of career ethics officials related to his involvement in the development, launch and promotion of Tech Force and its partner companies?
- Since Tech Force has launched or expanded, has OPM conducted any secondary review of Director Kupor's financial assets to ensure that there are not potential conflicts that arise related to Tech Force or any other OPM planned public-private partnerships?
- Did Director Kupor violate 18 U.S.C. § 208 or 5 C.F.R. § 2635.502 through his actions related to Tech Force, and if so, has the agency taken remedial action commensurate with any consequences required by law or that other agency employees would face in the same circumstances?
- Do any of the other officials involved in the establishment or implementation of Tech Force hold financial interests in any of the companies that are partners in the program?
- Are sufficient internal controls in place concerning review of the Director's financial conflicts of interest, including meaningful awareness of the Ethics Office of the mutual involvement of the Director and private sector partners, that will reasonably prevent additional violations going forward?
- Does the Tech Force program operate consistently with OPM's mission to "attract and retain top talent"?

Conclusion

The establishment of the Tech Force intentionally creates an apparent revolving door that provides certain selected companies the opportunity to reap benefits of government access and partnership in training their future workforce, raising questions about why such a program exists in an agency with a mission to recruit and retain a workforce that is meant "to serve the American public without interruption."[27] These circumstances draw additional scrutiny to actual and potential financial conflicts of interest in the agency director's role in the program while holding stock in at least one of the selected companies. The American people must be able to trust that federal officials are pursuing agency actions to achieve the stated mission of their agencies and doing so without regard to whether a particular decision or partnership could benefit their own financial portfolio.

CREW sincerely appreciates your time and consideration of this request.

Sincerely,

Donald K. Sherman
President and Chief Executive Officer

[27] *Supra Mission & History*, note 10.