



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

October 8, 2026

Keith Sonderling, Acting Director
U.S. Office of Government Ethics
250 E Street SW, Suite 750
Washington, DC 20024

Will Scharf, Counsel to the President
White House Counsel
1600 Pennsylvania Ave NW
Washington, DC 20500

Re: Potential violation of Standards of Ethical Conduct for Executive Branch Employees, 5 C.F.R. § 2635.702, involving Senior Counselor Peter Navarro's promotion of his book in his official capacity

Dear Acting Director Sonderling and Mr. Scharf,

Citizens for Responsibility and Ethics in Washington ("CREW") respectfully requests that the U.S. Office of Government Ethics ("OGE") and White House Counsel's Office investigate potential violations of the Standards of Ethical Conduct for Executive Branch Employees, 5 C.F.R. § 2635.702, involving White House Senior Counselor for Trade and Manufacturing Peter Navarro's promotion of his book in his official capacity. In several recent media interviews and posts to his social media account, Navarro has appeared in his official capacity and used the opportunity to encourage the sale of his forthcoming book project. CREW asks that your offices review this apparent violation of federal ethics law and take any necessary disciplinary action.

Background

Navarro has written a new book that will be released on October 20 and is titled "Why Fauci Must Rot in Prison."¹ However, he has not maintained the required clear separation between his private book deal and his public role as a White House official. On October 1, 2026, during an appearance on Bill O'Reilly's internet show, "We'll Do It Live!," Navarro was introduced by his official title, "Senior Counselor to the President" and described as "the top White House trade person."² While being interviewed in the White House, Navarro states "I want to show this, *Why*

¹ Ahmad Austin Jr., *Peter Navarro Uses White House TV Hit to Hawk His New Book on Fauci: 'Get It on Amazon Today, Please!'*, Mediaite (Oct. 7, 2026), <https://www.mediaite.com/media/tv/peter-navarro-uses-white-house-tv-hit-to-hawk-his-new-book-on-fauci-get-it-on-amazon-today-please/>.

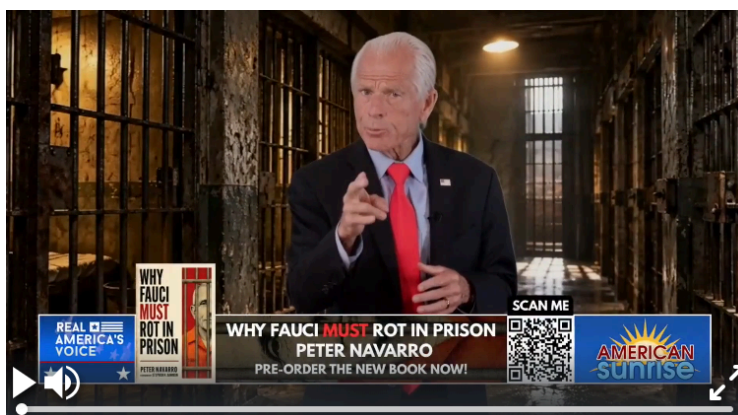
² Video, *We'll Do It LIVE! - Peter Navarro*, Bill O'Reilly.com (Oct. 1, 2026), <https://www.billoreilly.com/video?chartID=336&pid=45825> (at 1:03).

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Fauci Must Rot in Prison” as he held up his book and discussed its contents.³ Navarro posted a clip of that interview, including his discussion of the book, explaining that they were sitting in the White House for the interview, on his official X account.⁴

Navarro has continued to plug his book in official appearances that also violate his ethics obligations in even more explicit ways. One video on October 7 during *American Sunrise* on Real America’s Voice opens “with an AI-generated ad for the book” with the chyron showing an image of the book with the statement “PRE-ORDER THE NEW BOOK NOW!” and a QR code linking users to the book’s sales listing on Amazon.com.⁵



The QR code and Amazon website appear throughout the ad and continue to appear during the interview, even while another label appears clearly stating that Navarro is speaking from “The White House.”⁶



Navarro made a direct plea to viewers to purchase the book, stating “Get it on Amazon today, please!”⁷

Also on October 7, he appeared on *The Charlie Kirk Show* on Real America’s Voice for an interview standing in front of the White House, which the interviewers and Navarro expressly

³ *Id.* (at 34:30)

⁴ Peter Navarro (@RealPNavarro), X (Oct. 4, 2026 at 4:02 PM), <https://x.com/RealPNavarro/status/2106837305793425574?s=20>.

⁵ Austin, *supra* note 1.

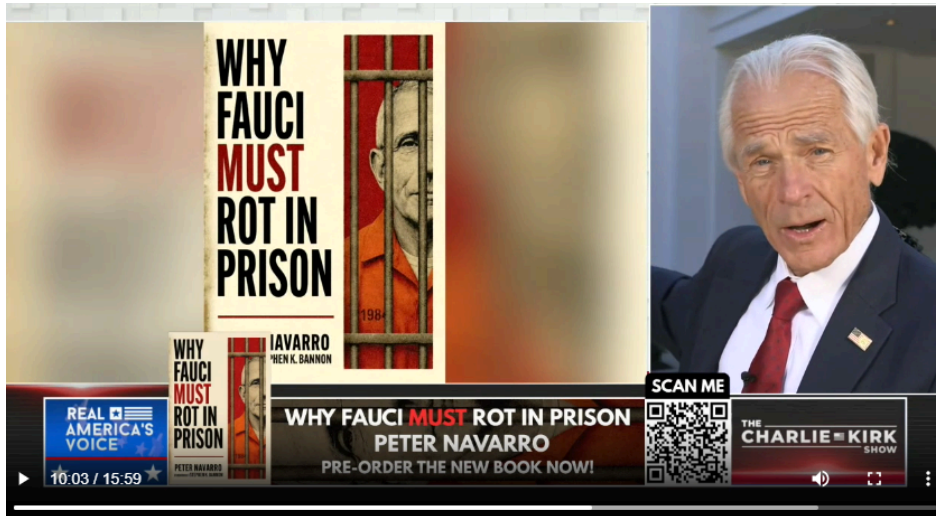
⁶ *Id.*

⁷ *Id.*

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noted before immediately discussing the book.⁸ Similar to the *American Sunrise* video, part of this video displays a chyron that shows the book, with a QR code for viewers to order it.⁹ He states, “what’s different about me and everybody else who can write a book like this, is I actually fought him right in the West Wing here.”¹⁰



Notably, Navarro’s X account profile, using the handle @RealPNavarro, identifies him as “Senior Counselor for Trade and Manufacturing | 45 & 47” and includes regular posts discussing his official work for the White House.¹¹ Under OGE guidance, these factors affirm that the account is an official government account, making it subject to the ethics rules governing official social media accounts.¹²

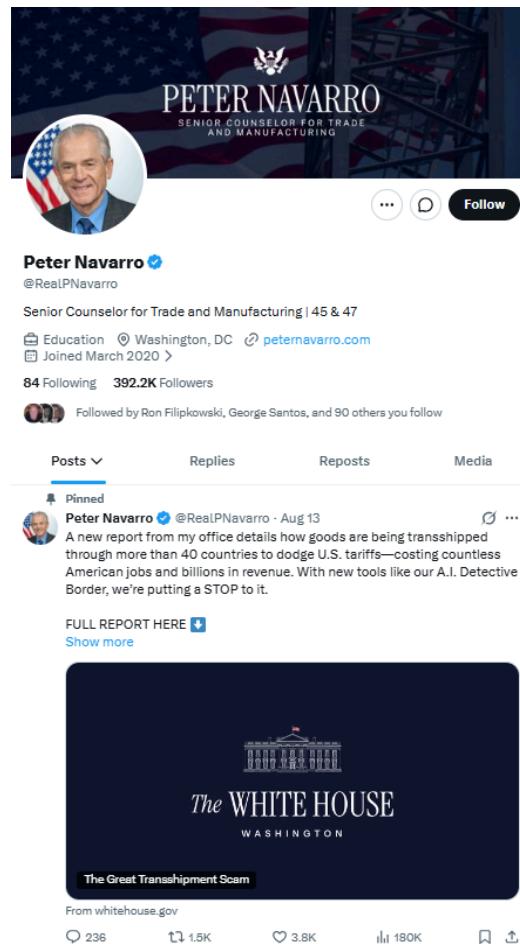
⁸ *Hormuz Exports Rebound, Diesel Prices Skyrocket*, The Charlie Kirk Show, Part 3 (Oct. 7, 2026), <https://americasvoice.news/video/8kV3NvOoBps5FtgC/> (at 4:45).

⁹ *Id.*

¹⁰ *Id.* (at 9:57)

¹¹ See Peter Navarro (@RealPNavarro), X <https://x.com/RealPNavarro>.

¹² See generally U.S. Off. of Gov’t Ethics, Legal Advisory LA-15-03, *The Standards of Conduct as Applied to Personal Social Media Use* (Apr. 9, 2015), <https://tinyurl.com/3t6sdfdn> (distinguishing how officials may use official social media accounts); U.S. Off. of Gov’t Ethics, Legal Advisory LA-23-03, *The Standards of Conduct and 18 U.S.C. § 208 as Applied to Official Social Media Use* (Jan. 30, 2023), <https://tinyurl.com/3ue2z8z3>.



Relevant law

Federal ethics regulations concerning the "use of office for private gain" clearly prohibit any employee from "us[ing] their public office for their own private gain [or] for the endorsement of any product, service, or enterprise."¹³ Specifically, the regulations provide that "[a]n employee may not use or permit the use of their Government position or title or any authority associated with their public office to endorse any product, service or enterprise" except in circumstances clearly inapplicable here.¹⁴ In fact, one example provided in the regulations specifically explains that an official "may not use their official title or refer to their Government position in a book jacket endorsement [...]. Nor may they do so in a book review published in a newspaper."¹⁵ The example properly illustrates that the medium through which an official makes an endorsement or promotes a product is not critical to the analysis, meaning that Navarro's use of his title and discussion of his official position while simultaneously promoting his own book is a violation of his ethics obligations.

OGE guidance on use of social media accounts clearly instructs that "official accounts are for official purposes."¹⁶ In guidance to agencies and executive branch programs, OGE explained

¹³ 5 C.F.R. § 2635.702.

¹⁴ *Id.* § 2635.702(c).

¹⁵ *Id.* (example 4).

¹⁶ U.S. Off. of Gov't Ethics, Legal Advisory LA-15-03, *supra* note 12 at 6 (distinguishing how officials may use official social media accounts).

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that “employees who are entrusted with the operation of official social media accounts must prevent unauthorized use of those accounts and avoid improper endorsements of private organizations on such accounts.”¹⁷

Federal law further prohibits the use of public funds for non-official purposes. Under 31 U.S.C. § 1301(a), “[a]ppropriations shall be applied only to the objects for which the appropriations were made.” Appropriations for the Executive Office of the President were not made for the purpose of endorsing commercial products. By endorsing his book while acting in his official capacity, Navarro appears to have violated the statute.

As the law makes clear, public officials should not use their offices for their own private gain. Government resources should be used for public purposes, not to promote any government official’s commercial endeavors, as OGE has affirmed in another case involving a White House advisor promoting products during an official appearance.¹⁸ Navarro appears to have violated both the letter and the spirit of these rules when he used his position to endorse his book while making appearances in his official capacity, using his title and White House office space and landscape.

We are concerned about what appears to be a pattern developing of the use of official offices by senior officials in this administration to benefit business interests of officials themselves, their relatives or their associates.¹⁹ Navarro’s actions appear to be just the latest example of this trend. We hope you will act not only to respond to this apparent violation, but to reverse this pattern. CREW therefore requests that you commence an investigation into Navarro’s conduct and take any necessary disciplinary action against him.

CREW greatly appreciates your prompt attention to this matter.

Sincerely,



Donald K. Sherman
President and Chief Executive Officer

¹⁷ U.S. Off. of Gov’t Ethics, Legal Advisory LA-23-03, *supra* note 12.

¹⁸ See Letter from Walter M. Shaub, Jr., Director, U.S. Off. of Gov’t Ethics, to Stefan C. Passantino, Deputy Counsel to the President and Designated Agency Ethics Official, The White House (Feb. 13, 2017), <https://perma.cc/6D23-JD7E>.

¹⁹ See, e.g., Letter from Donald K. Sherman, President and Chief Executive Officer, Citizens for Responsibility and Ethics in Washington, to The Honorable Mitch Behm, Deputy Inspector General, performing the duties of Inspector General, U.S. Dep’t of Transp. (July 7, 2026), <https://www.citizensforethics.org/legal-action/legal-complaints/crew-files-complaint-against-transportation-secretary-sean-duffy/>; Letter from Donald K. Sherman, President and Chief Executive Officer, Citizens for Responsibility and Ethics in Washington, to The Honorable Sarah Nelson, Assistant Inspector General for Management, U.S. Dep’t of Energy (Jan. 27, 2026), <https://www.citizensforethics.org/legal-action/legal-complaints/crew-submits-complaint-urging-ig-investigation-into-doe-officials-potential-ethics-violations/>.