

MEET SUSIE WILES' CONTROVERSIAL CORPORATE LOBBYING CLIENTS

A RADIOACTIVE WASTE DUMP, FOREIGN MINING
COMPANIES, A TOBACCO COMPANY, AND MORE

Jon Golinger

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Introduction

“Well, you have to stop listening to lobbyists.”

– Donald Trump, August 20, 2024¹

During the 2024 Presidential campaign, Donald Trump said he would not listen to lobbyists if he were elected again.² However, with Trump’s first big official public act as President-elect, he broke that promise when he announced two days after the election that he will appoint corporate lobbyist Susan “Susie” Wiles to be his new White House Chief of Staff.³ Since the White House Chief of Staff has historically been the gatekeeper for the President and one of the most powerful Presidential advisers and people influencing the operations of the federal government, Trump will undoubtedly be “listening” to Wiles.

News reports about Wiles’ appointment have primarily focused on her election campaign roles as a veteran of Florida electoral politics and in Trump’s three presidential campaigns, including as Trump’s 2024 Senior Campaign Advisor and as one of his two 2024 campaign managers.⁴ Largely overlooked, however, has been Wiles’ extensive work as a registered federal lobbyist during the first Trump Administration, in the years afterwards, and at the exact same time that she was running Trump’s 2024 Presidential Campaign.⁵

This report examines federal lobbying disclosures filed by Wiles and the two lobbying firms she worked for as a registered federal lobbyist. Wiles represented 42 clients including corporations, government contractors, and business associations between 2017 and 2024.⁶ These disclosures reveal that Wiles’ lobbying client list is both extensive and littered with controversial clients who stand to benefit from having their former lobbyist running the White House. This report’s findings raise serious questions about potential conflicts of interest that need to be answered before Inauguration Day.

¹ *This Past Weekend* podcast interview, minute 32:27, August 20, 2024;

<https://www.youtube.com/watch?v=vC5cHjcgT5g>

² *Id.*

³ “Trump Names Susie Wiles as his White House Chief of Staff,” *New York Times*, November 7, 2024;

<https://www.nytimes.com/2024/11/07/us/politics/susie-wiles-trump-white-house-chief-of-staff.html>

⁴ “Donald Trump picks Susie Wiles to be chief of staff,” *Politico*, 11/7/24;

<https://www.politico.com/news/2024/11/07/donald-trump-susie-wiles-chief-of-staff-00188346>; “Who is Susie

Wiles, Donald Trump’s new White House chief of staff?,” *Associated Press*, 11/7/24;

<https://apnews.com/article/who-is-susie-wiles-32df8958bedde5f3f2d55fd071979692>

⁵ *Id.*; United States Senate Lobbying Disclosure Act Database Lobbying Reports (LDA Reports) filed for “Susan Wiles,” accessed November 13, 2024; <https://tinyurl.com/354yp2sd>

⁶ United States Senate Lobbying Disclosure Act Database Lobbying Reports (LDA Reports) filed for “Susan Wiles,” accessed November 13, 2024; <https://tinyurl.com/354yp2sd>; Foreign Agents Registration Act (FARA) Statement, filed 1/22/19, stating that Susan Wiles was registering to lobby on behalf of the People’s Democratic Party of Nigeria; <https://efile.fara.gov/docs/6415-Short-Form-20190122-94.pdf>

Findings

- Federal lobbying disclosures reveal that newly Trump-Appointed White House Chief of Staff Susie Wiles was a registered lobbyist starting in November 2017 until at least April 2024.⁷
- Wiles was registered to lobby the federal government for 42 different clients, including large corporations, government contractors, and business associations.⁸
- On behalf of her clients, Wiles lobbied the White House, Congress, and at least eight federal agencies about regulations, federal policy, and business development.⁹
- Wiles' federal lobbying clients have included:
 - *A waste management company that has resisted removing nuclear waste from its radioactive landfill.*¹⁰
 - *A foreign copper and gold mining company that wants to eliminate federal opposition to its plan to dig a massive mine in a pristine watershed.*¹¹

⁷ LDA Reports filed for "Susan Wiles," accessed November 13, 2024; <https://tinyurl.com/354yp2sd>; The most recent lobbyist report filed disclosing lobbying activity by Wiles was on April 10, 2024 covering lobbying activity from January 1, 2024-March 31, 2024; <https://lda.senate.gov/filings/public/filing/53da428d-ab2e-4be4-95e5-b2f355c6a267/print/>

⁸ LDA Reports filed for "Susan Wiles," accessed November 13, 2024; <https://tinyurl.com/354yp2sd>; FARA Statement filed 1/22/19, stating that Susan Wiles was registering to lobby on behalf of the People's Democratic Party of Nigeria; <https://efile.fara.gov/docs/6415-Short-Form-20190122-94.pdf>

⁹ *Id.*

¹⁰ LDA Report for Ballard Partners, listing Susan Wiles as a lobbyist for client Republic Services Procurement, Inc., filed 4/18/19; <https://lda.senate.gov/filings/public/filing/39ed5b3f-c7dd-41c3-9ea2-7ed11ac74291/print/>; "How a US health agency became a shield for polluters," Reuters, 8/7/24 ("For all the radioactive publicity, though, Republic beat back neighbors' claims. The nuclear waste is still there, and the government hasn't said when a cleanup will begin."); <https://www.reuters.com/investigates/special-report/usa-pollution-atsdr-landfill/>;

¹¹ LDA Lobbying Registration for Ballard Partners, listing Susan Wiles as a lobbyist, for client The Pebble Partnership, listing Northern Dynasty Minerals in Vancouver, Canada as 100% owner, filed 4/26/19; <https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/RR/301039683.xml>; Ballard Partners lands contract with major mining company," Florida Politics, 5/1/19; <https://floridapolitics.com/archives/295321-ballard-partners-lands-contract-with-major-mining-company/>; "Supreme Court rejects Pebble mine, climate

- *A tobacco company that sought to block federal health restrictions on its candy-flavored cigars, which the Food and Drug Administration (FDA) has found are attractive to kids.*¹²
- *A foreign news company whose owner has been indicted for money laundering.*¹³
- *A foreign mining private equity firm seeking approval to develop an open-pit leach gold mine on federal public lands.*¹⁴
- Wiles also lobbied on behalf of a foreign political party.¹⁵ According to Foreign Agents Registration Act disclosures filed by Wiles or on her behalf, she lobbied for The People’s Democratic Party of Nigeria to provide support regarding its relations with U.S. government officials, U.S. businesses, and non-governmental audiences.¹⁶

and water cases,” E&E News by Politico, 1/8/24; <https://www.eenews.net/articles/supreme-court-rejects-pebble-mine-climate-and-water-cases/>

¹² LDA Registration for Ballard Partners, listing Susan Wiles as a lobbyist, for client SI Group Client Services, affiliated with Swisher International, filed 4/26/19; <https://lda.senate.gov/filings/public/filing/f77e8958-e7c1-47a0-a6a4-95fc87137548/print/>; “Tobacco Companies Speak Out Against FDA Menthol Ban,” NACS Daily News, 4/29/22; https://www.convenience.org/Media/Daily/2022/Apr/29/1-Tobacco-Companies-Speak-Out-Against-Ban_GR; “Flavored Tobacco Products Attract Kids,” Campaign for Tobacco Free Kids Fact Sheet, September 24, 2024; <https://assets.tobaccofreekids.org/factsheets/0383.pdf>; “FDA cracks down on flavored cigarettes labeled as cigars,” The Hill, 12/9/16; <https://thehill.com/regulation/administration/309682-fda-cracks-down-on-flavored-cigarettes-labeled-as-cigars/>

¹³ LDA Report for Ballard Partners, listing Susan Wiles as a lobbyist for client Globovision Tele CA, Corp., filed 1/11/18; <https://lda.senate.gov/filings/public/filing/ccd5a857-5a40-4107-9d1a-b80425c0a3a9/print/>; “Venezuelan Television News Network Owner Charged in Alleged \$1.2B Money Laundering Scheme,” U.S. Department of Justice Press Release, 10/23/24; <https://www.justice.gov/opa/pr/venezuelan-television-news-network-owner-charged-alleged-12b-money-laundering-scheme>

¹⁴ LDA Registration filed by Ballard Partners on 9/3/19; <https://lda.senate.gov/filings/public/filing/afab0008-5563-4837-97e0-5217ebebada9/print/>; “Waterton Announces Receipt of Final EIS, Initiation of Key Infrastructure Development and Pending Feasibility Study for its Gemfield Project in Nevada,” Press Release, 9/16/19

¹⁵ Foreign Agents Registration Act Statement (FARA), filed 1/22/19, stating that Susan Wiles was registering to lobby on behalf of the People’s Democratic Party of Nigeria; <https://efile.fara.gov/docs/6415-Short-Form-20190122-94.pdf>

¹⁶ FARA Statement, filed 1/22/19, stating that Susan Wiles was registering to “provide government services for the People’s Democratic Party of Nigeria” and “provide support for the People’s Democratic Party of Nigeria regarding their relations with U.S. government officials, U.S. business entities, and non-governmental audiences”; <https://efile.fara.gov/docs/6415-Short-Form-20190122-94.pdf>; FARA Supplemental Statement, page 34, filed 5/31/19, stating that Wiles’ lobbying firm received \$269,980 on

Susie Wiles' Controversial Corporate Lobbying Clients

Federal lobbying filings reveal that newly Trump-Appointed White House Chief of Staff Susie Wiles was registered to lobby the federal government between 2017 and 2024 on behalf of 42 different clients.¹⁷ According to federal filings, Wiles was registered to lobby the White House, Congress, and federal agencies including the Food and Drug Administration, Environmental Protection Agency, the Departments of Interior, Agriculture, Homeland Security, Energy, Commerce, and the U.S. Army Corps of Engineers.¹⁸ Wiles was registered to lobby for a wide range of clients on matters involving government regulation, federal policy, and business development.¹⁹

Wiles' lobbying client list is checkered with controversial corporate clients such as:

- **Republic Services²⁰**
 - According to federal lobbying filings, Wiles was registered to lobby the first Trump White House, Congress, and federal agencies in 2019 for the waste management company Republic Services.²¹
 - According to news reports, Republic Services has for years fought neighbors' efforts to have the federal government require the company to pay to remove radioactive nuclear waste from its dump in a suburb of St. Louis, Missouri.²²

12/4/18 from the People's Democratic Party of Nigeria for "Fee/Reimbursement;" <https://efile.fara.gov/docs/6415-Supplemental-Statement-20190531-4.pdf>; FARA Supplemental Statement, filed 6/15/21 stating that, as of 3/20/19, Wiles' lobbying firm terminated the People's Democratic Party of Nigeria as a client and therefore "Susan Wiles was no longer an agent for any foreign principal."

<https://efile.fara.gov/docs/6415-Supplemental-Statement-20210615-10.pdf>

¹⁷ LDA Reports filed for "Susan Wiles," accessed November 13, 2024; <https://tinyurl.com/354yp2sd>; FARA Statement filed 1/22/19, stating that Susan Wiles was registering to lobby on behalf of the People's Democratic Party of Nigeria; <https://efile.fara.gov/docs/6415-Short-Form-20190122-94.pdf>

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ <https://www.republicservices.com/>

²¹ LDA Report for Ballard Partners, listing Susan Wiles as a lobbyist for client Republic Services Procurement, Inc., filed 4/18/19; <https://lda.senate.gov/filings/public/filing/39ed5b3f-c7dd-41c3-9ea2-7ed11ac74291/print/>

²² "How a US health agency became a shield for polluters," Reuters, 8/7/24 ("For all the radioactive publicity, though, Republic beat back neighbors' claims. The nuclear waste is still there, and the government

- Lobbying reports filed in 2019²³ disclosed that Wiles' firm was paid \$140,000 that year by Republic Services to lobby the following federal offices on the following issues:
 - Offices lobbied: U.S. Senate, U.S. House of Representatives, Department of Energy, Department of Homeland Security, Environmental Protection Agency.
 - Issues lobbied: Disposition of a Superfund designated landfill, Re-siting of a landfill; recyclables pricing, disposition of a closed landfill.
- **The Pebble Partnership, owned by Northern Dynasty Minerals²⁴**
 - According to federal lobbying filings, Wiles was registered to lobby the first Trump White House and the EPA in 2019 for the Canadian mining company Pebble Partnership/Northern Dynasty Minerals.²⁵
 - According to news reports, Northern Dynasty Minerals has lobbied, fought, and sued the EPA to block environmental regulations so the mining company could dig the massive "Pebble Project" – copper and gold mines in the pristine Alaska Bristol Bay watershed, home to one of the world's premier salmon fisheries.²⁶

hasn't said when a cleanup will begin."); <https://www.reuters.com/investigates/special-report/usa-pollution-atsdr-landfill/>; "Records reveal 75 years of government downplaying, ignoring risks of St. Louis radioactive waste," St. Louis Business Journal, 7/12/23; <https://lda.senate.gov/filings/public/filing/36ab7694-c72a-4496-8ba4-58ddf37095d9/print/>; "Two Stay-At-Home Moms Are Waging War Against the Feds Over Illegal Toxic Waste," Vice, 6/1/16; <https://www.vice.com/en/article/two-stay-at-home-moms-are-waging-war-against-the-feds-over-illegal-toxic-waste/>

²³ LDA Report filed by Ballard Partners on 4/18/19; <https://lda.senate.gov/filings/public/filing/39ed5b3f-c7dd-41c3-9ea2-7ed11ac74291/print/>; LDA Report filed by Ballard Partners on 7/18/19; <https://lda.senate.gov/filings/public/filing/dbbd7dcf-abb3-46dd-ad68-3394fd63c7e6/print/>; LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/36ab7694-c72a-4496-8ba4-58ddf37095d9/print/>

²⁴ <https://northerndynastyminerals.com/about-us/pebble-partnership/>

²⁵ LDA Lobbying Registration for Ballard Partners, listing Susan Wiles as a lobbyist, for client The Pebble Partnership, listing Northern Dynasty Minerals in Vancouver, Canada as 100% owner, filed 4/26/19; <https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/RR/301039683.xml>

²⁶ "Ballard Partners lands contract with major mining company," Florida Politics, 5/1/19; <https://floridapolitics.com/archives/295321-ballard-partners-lands-contract-with-major-mining-company/>; "EPA proposes restrictions in fight over Alaska mine," Associated Press, 5/25/22; <https://www.wbay.com/2022/05/25/epa-proposes-restrictions-fight-over-alaska-mine/>

EPA regulations blocking the mine have been upheld by the courts.²⁷

- Lobbying reports filed in 2019²⁸ disclosed that Wiles' firm was paid \$180,000 that year by The Pebble Partnership/Northern Dynasty Minerals to lobby the following federal offices on the following issues:
 - Offices lobbied: White House, Environmental Protection Agency (EPA)
 - Issues lobbied: Mining Regulation
- **SI Group Client Services, aka Swisher Sweets tobacco company²⁹**
 - According to federal lobbying filings, Wiles was registered to lobby the federal government from 2019-2022 and from 2023-2024 for the tobacco company Swisher International Inc., maker of Swisher Sweets cigars.³⁰
 - According to news reports, Swisher International has for years fought the Food and Drug Administration to block restrictions on its sale of flavored cigarettes that are labeled as little cigars or cigars, under the label "Swisher Sweets," with youth-appealing flavors such as grape and banana smash.³¹

²⁷ "Supreme Court rejects Pebble mine, climate and water cases," E&E News by Politico, 1/8/24; <https://www.eenews.net/articles/supreme-court-rejects-pebble-mine-climate-and-water-cases/>

²⁸ LDA Report filed by Ballard Partners on 7/18/19; <https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/Q2/301049360.xml>; LDA Report filed by Ballard Partners on 10/21/19; <https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/Q3/301075339.xml>

²⁹ <https://swishersweets.com/>; Lobbying Disclosure Registrant Information: Swisher International, Inc., f/k/a SI Group Client Services; https://lobbyingdisclosure.house.gov/lookup.asp?reg_id=44300

³⁰ LDA Registration for Ballard Partners, listing Susan Wiles as a lobbyist, for client SI Group Client Services, affiliated with Swisher International, filed 4/26/19; <https://lda.senate.gov/filings/public/filing/f77e8958-e7c1-47a0-a6a4-95fc87137548/print/>; LDA Report for Ballard Partners terminating SI Group Client Services as a client, filed 4/20/22; <https://lda.senate.gov/filings/public/filing/6b16ff34-6081-41c3-9d5b-21a81aacc489/print/>; LDA Registration for Mercury Public Affairs, LLC, listing Susan Wiles as a lobbyist, for client SI Group Client Services, filed 1/23/23; <https://lda.senate.gov/filings/public/filing/f777b504-87cc-4609-a198-e7a67c06de00/print/>

³¹ Swisher Sweets Cigarillos flavors including grape, strawberry, and banana smash, Swisher website accessed 11/12/24; <https://swishersweets.com/collections/swisher-sweets-classics>; "FDA takes action against

- Lobbying reports filed in 2019, 2021, 2022, 2023, and 2024³² disclosed that Wiles' firms were paid \$500,000 by SI Group Client Services/Swisher International to lobby the following federal offices on the following issues:
 - Offices lobbied: White House, U.S. Senate, U.S. House of Representatives, Department of State, Department of Health and Human Services
 - Issues lobbied: Tobacco Regulatory Issues, Monitor FDA issues regarding flavoring in tobacco products, Compliance with regulatory matters; FDA regulations

four tobacco manufacturers for illegal sales of flavored cigarettes labeled as little cigars or cigars," FDA news release, 12/9/16; <https://www.fda.gov/news-events/press-announcements/fda-takes-action-against-four-tobacco-manufacturers-illegal-sales-flavored-cigarettes-labeled-little>; "Eleventh Circuit Denies Swisher International's Request For An Injunction of Further Enforcement by FDA," Tobacco Law Blog, 2/15/22; <https://www.tobaccolawblog.com/2022/02/eleventh-circuit-denies-swisher-internationals-request-for-an-injunction-of-further-enforcement-by-fda/>; "Tobacco Companies Speak Out Against FDA Menthol Ban," NACS Daily News, 4/29/22; <https://www.convenience.org/Media/Daily/2022/Apr/29/1-Tobacco-Companies-Speak-Out-Against-Ban> GR

³² LDA Report filed by Ballard Partners on 7/18/19; <https://lda.senate.gov/filings/public/filing/5e6e06fa-72c4-47cf-8c28-2a04267f0ce0/print/>; LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/c08c4e46-aaf7-42c8-876e-458e49ff1e16/print/>; LDA Report filed by Ballard Partners on 1/16/20; <https://lda.senate.gov/filings/public/filing/c2773cc0-2cf4-477f-b8b3-4f3d8ce5191d/print/>; LDA Report filed by Ballard Partners on 1/16/20; <https://lda.senate.gov/filings/public/filing/c2773cc0-2cf4-477f-b8b3-4f3d8ce5191d/print/>; LDA Report filed by Ballard Partners 7/20/21; <https://lda.senate.gov/filings/public/filing/0b643af6-fc93-4dce-8ad6-7d3c5efa51b6/print/>; LDA Report filed by Ballard Partners 10/15/21; <https://lda.senate.gov/filings/public/filing/62c20a33-4997-4c1d-8f7b-c5036f5278ae/print/>; LDA Report filed by Ballard Partners 1/18/22; <https://lda.senate.gov/filings/public/filing/79dcbdf2-32bc-4666-b7c2-05e35d97a8f7/print/>; LDA Report filed by Ballard Partners 4/20/22; <https://lda.senate.gov/filings/public/filing/6b16ff34-6081-41c3-9d5b-21a81aacc489/print/>; LDA Report filed by Mercury Public Affairs, 8/28/23; <https://lda.senate.gov/filings/public/filing/2e13e8d8-1034-40a2-a0a9-801d34880f5b/print/>; LDA Report filed by Mercury Public Affairs, 10/19/23; <https://lda.senate.gov/filings/public/filing/79f40e8b-09e2-41fc-a1b5-1cb22ae980e4/print/>; LDA Report filed by Mercury Public Affairs, 1/22/24; <https://lda.senate.gov/filings/public/filing/b53823b0-eb63-4d38-b543-462a7d8982f3/print/>; LDA Report filed by Mercury Public Affairs, 4/10/24; <https://lda.senate.gov/filings/public/filing/53da428d-ab2e-4be4-95e5-b2f355c6a267/print/>

- **Globovision Tele Ca, Corp.**³³
 - According to federal lobbying filings, Wiles was registered to lobby the first Trump White House in 2017 and 2018 on behalf of Globovision Tele Ca, Corp.³⁴
 - In 2019, the U.S. Treasury Department imposed sanctions on the owner of the company for corruption and in October 2024 the Justice Department charged him in an alleged \$1.2 billion money laundering scheme.³⁵
 - Lobbying reports filed in 2017 and 2018³⁶ disclosed that Wiles' firm was paid at least \$450,000 by Globovision Tele CA, Corp. to lobby the following federal offices on the following issues:
 - Offices lobbied: White House
 - Issues lobbied: General Government Policies and Practices, Business to Business development.

³³ "Treasury Targets Venezuela Currency Exchange Network Scheme Generating Billions of Dollars for Corrupt Regime Insiders," U.S. Department of Treasury Press Release, 1/8/19; ("Globovision Tele CA is a television station located in Caracas, Venezuela, and is owned or controlled by Gorrin and Peredomo. Globovision Tele CA, Corp. is registered in Miami, Florida, and is owned or controlled by Gorrin and Peredomo."); <https://home.treasury.gov/news/press-releases/sm583>

³⁴ LDA Report for Ballard Partners, listing Susan Wiles as a lobbyist for client Globovision Tele CA, Corp., filed 1/11/18; <https://lda.senate.gov/filings/public/filing/ccd5a857-5a40-4107-9d1a-b80425c0a3a9/print/>; LDA Report for Ballard Partners, listing Susan Wiles as a lobbyist for client Globovision Tele CA, Corp., filed 4/20/18; <https://lda.senate.gov/filings/public/filing/e900f2c9-f53e-47d5-bc12-2f13260ce900/print/>

³⁵ "Treasury Targets Venezuela Currency Exchange Network Scheme Generating Billions of Dollars for Corrupt Regime Insiders," U.S. Department of Treasury Press Release, 1/8/19; <https://home.treasury.gov/news/press-releases/sm583>; "Venezuelan Television News Network Owner Charged in Alleged \$1.2B Money Laundering Scheme," U.S. Department of Justice Press Release, 10/23/24; <https://www.justice.gov/opa/pr/venezuelan-television-news-network-owner-charged-alleged-12b-money-laundering-scheme>

³⁶ LDA Report filed by Ballard Partners on 1/11/18; <https://lda.senate.gov/filings/public/filing/ccd5a857-5a40-4107-9d1a-b80425c0a3a9/print/>; LDA Report filed by Ballard Partners on 4/20/18; <https://lda.senate.gov/filings/public/filing/e900f2c9-f53e-47d5-bc12-2f13260ce900/print/>; LDA Report filed by Ballard Partners on 7/18/18; <https://lda.senate.gov/filings/public/filing/69b16bcb-1495-49ab-81c3-3f34e6f5e058/print/>; LDA Report filed by Ballard Partners on 7/30/18; <https://lda.senate.gov/filings/public/filing/fe395ad8-2562-4748-b876-d793eb2aa324/print/>; LDA Report filed by Ballard Partners on 12/27/18; <https://lda.senate.gov/filings/public/filing/fe3b6455-0bdc-4383-bf99-0beb12776b5c/print/>

- **Waterton Global Resource Management, Inc.**³⁷
 - According to federal lobbying filings, Wiles was registered to lobby the first Trump White House and federal agencies in 2019 for a Canadian private equity firm specializing in the metals and mining sector named Waterton Global Resource Management Inc.³⁸
 - According to news reports, in 2019 Waterton was in the process of obtaining approval of its final Environmental Impact Statement and other federal and state permits required to construct and operate its Gemfield Project open-pit heap leach gold mine on public and private land near Las Vegas, Nevada.³⁹
 - Lobbying reports filed in 2019⁴⁰ disclosed that Wiles' firm was paid \$180,000 that year by Waterton Global Resource Management to lobby the following federal offices on the following issues:
 - Offices lobbied: White House, Department of Interior, Department of Agriculture
 - Issues lobbied: Lobbying related to mining minerals on federal lands, Environmental and Natural Resources Issues, and Property Rights

³⁷ <https://www.watertonglobal.com/>

³⁸ LDA Registration filed by Ballard Partners on 9/3/19; <https://lda.senate.gov/filings/public/filing/afab0008-5563-4837-97e0-5217ebebada9/print/>

³⁹ "Record of decision for Gemfield mining project in Nevada," Pahrump Valley Times, August 2, 2019; <https://pvtimes.com/news/record-of-decision-for-gemfield-mining-project-in-nevada-73232/>; "Waterton Announces Receipt of Final EIS, Initiation of Key Infrastructure Development and Pending Feasibility Study for its Gemfield Project in Nevada," Press Release, 9/16/19;

<https://www.miningstockeducation.com/2019/09/waterton-announces-receipt-of-final-eis-initiation-of-key-infrastructure-development-and-pending-feasibility-study-for-its-gemfield-project-in-nevada/>; "This is the Wild West Out Here: How Washington is bending over backward for mining companies in Nevada at the expense of environmental rules," Politico, 2/9/20;

<https://www.miningstockeducation.com/2019/09/waterton-announces-receipt-of-final-eis-initiation-of-key-infrastructure-development-and-pending-feasibility-study-for-its-gemfield-project-in-nevada/>

⁴⁰ LDA Report filed by Ballard Partners on 10/21/19; <https://lda.senate.gov/filings/public/filing/08be5c00-a70d-43d3-91fd-438275b1ede5/print/>; LDA Lobbying Report filed by Ballard Partners on 1/16/2020; <https://lda.senate.gov/filings/public/filing/e0e6da85-32f3-4212-9500-c6c6c5f205d4/print/>

Susie Wiles' Federal Lobbying Clients, 2017-2024

<i>Client Name</i>	<i>Wiles' Lobbying Firm</i>	<i>Filing Year(s)</i>	<i>LDA Reports Source</i>
CSG DEVELOPMENT SERVICES II, LLC	Ballard Partners, LLC	2017, 2018, 2019	https://tinyurl.com/42487nfz
CHILDREN'S HOSPITAL ASSOCIATION	Ballard Partners, LLC	2017, 2018	https://tinyurl.com/3xvj5jms
CITIZENS FOR RESPONSIBLE ENERGY SOLUTIONS (CRES)	Ballard Partners, LLC	2017, 2018, 2019, 2020, 2021	https://tinyurl.com/2nzvjws8
CITY OF JACKSONVILLE	Ballard Partners, LLC	2017, 2018, 2019, 2020, 2021, 2022	https://tinyurl.com/3t7px8b2
THE SUZANNE WRIGHT FOUNDATION	Ballard Partners, LLC	2017, 2018, 2019	https://tinyurl.com/mpy6kh6h
GLOBOVISION TELE CA, CORP.	Ballard Partners, LLC	2017, 2018	https://tinyurl.com/4ezc7zr9
CHILDREN'S HOSPITAL ASSOCIATION	Ballard Partners, LLC	2017, 2018	https://tinyurl.com/3xvj5jms
JACKSONVILLE PORT AUTHORITY	Ballard Partners, LLC	2017, 2018, 2019, 2020, 2021, 2022	https://tinyurl.com/22r2aept
LATHROP GAGE LLP	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/5n82d25p
KRUGER, INC.	Ballard Partners, LLC	2018	https://tinyurl.com/22uxvyb6
MIKE MOORE LAW FIRM	Ballard Partners, LLC	2018	https://tinyurl.com/ys57p9p3
LABORATORY CORPORATIONS OF AMERICA HOLDINGS	Ballard Partners, LLC	2018	https://tinyurl.com/2h2m4u4p
THE MOSAIC COMPANY	Ballard Partners, LLC	2017, 2018	https://tinyurl.com/mrx59dk6
POINTSTATE CAPITAL LP	Ballard Partners, LLC	2018	https://tinyurl.com/yh449m9p
EAGLE LNG PARTNERS LLC	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/5n7d3tuh
G.L. HOMES OF FLORIDA CORPORATION	Ballard Partners, LLC	2018	https://tinyurl.com/2m6pyx9y
ARTOC AUTO	Ballard Partners, LLC	2018	https://tinyurl.com/39333rwi
HOLLAND & KNIGHT LLP	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/5n6epfs9
MOTION PICTURE ASSOCIATION OF AMERICA, INC.	Ballard Partners, LLC	2018	https://tinyurl.com/33wmk9p5

CKP INSURANCE, LLP	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/yc24zn2t
NEW MEXICO CATTLE GROWERS ASSOCIATION	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/5n85p9pv
CITRUS HEALTH NETWORK	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/2ymn348p
AMERICAN GTL ENERGY HOLDINGS LP	Ballard Partners, LLC	2018	https://tinyurl.com/2ynnjcyu
LEN-ANGELINE LLC	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/5n98vksp
KENDALL PROPERTIES AND INVESTMENTS	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/yc67vpaf
ALLIANCE RESOURCE PARTNERS, L.P.	Ballard Partners, LLC	2019, 2020	https://tinyurl.com/yc67vpaf
GENERAL MOTORS LLC	Ballard Partners, LLC	2019	https://tinyurl.com/ypatheps
TMM, INC.	Ballard Partners, LLC	2019	https://tinyurl.com/yjme84da
REPUBLIC SERVICES PROCUREMENT, INC.	Ballard Partners, LLC	2019	https://tinyurl.com/yw69zce4
THE PEBBLE PARTNERSHIP/NORTHERN DYNASTY MINERALS	Ballard Partners, LLC	2019	https://tinyurl.com/5bda6sky
SI GROUP CLIENT SERVICES/SWISHER	Ballard Partners, LLC; Mercury Public Affairs, LLC	2019, 2021, 2022, 2023, 2024	https://tinyurl.com/5dzcbv4z
CONSUMER ENERGY ALLIANCE	Ballard Partners, LLC	2019	https://tinyurl.com/2au8jhf7
CONTINENTAL HEAVY CIVIL CORP.	Ballard Partners, LLC	2019	https://tinyurl.com/bdews2ra
SAFE HARBOR TECHNOLOGIES, LLC	Ballard Partners, LLC	2019	https://tinyurl.com/3mmt6t8k
BANKERS FINANCIAL CORPORATION	Ballard Partners, LLC	2019	https://tinyurl.com/yy36jyac
IGT GLOBAL SOLUTIONS	Ballard Partners, LLC	2019	https://tinyurl.com/4ewkd8pk
WATERTON GLOBAL RESOURCE MANAGEMENT, INC.	Ballard Partners, LLC	2019	https://tinyurl.com/ysebb383
CAPLIN FAMILY OFFICES	Ballard Partners, LLC	2020	https://tinyurl.com/2vkc4y3u
SEAL SHIELD, LLC	Ballard Partners, LLC	2020, 2021	https://tinyurl.com/25sjze4a
ORIGIN LOGISTICS, LLC	Ballard Partners, LLC	2020	https://tinyurl.com/3zkarjpi
ZETA GLOBAL	Ballard Partners, LLC	2021	https://tinyurl.com/ypymhytj
PEOPLE'S DEMOCRATIC PARTY OF NIGERIA	Ballard Partners, LLC	2018, 2019	https://tinyurl.com/4ssjx56d ; https://tinyurl.com/yv9vtf6u

Recommendations

A person with this record of controversial business and foreign political party representation should not be White House Chief of Staff.

Assuming, however, that her appointment will proceed, before assuming her White House Chief of Staff position on January 20, 2025, Wiles at bare minimum should:

- 1) Disclose the full list of what exactly she did for each client she lobbied the federal government for: the names of the individuals she lobbied, what she asked those individuals to do or not to do, and what resulted from her lobbying.
- 2) Recuse herself from all decision-making involving her past lobbying clients and the federal agencies that are making decisions that affect her lobbying clients.
- 3) Accept a Voluntary Permanent Post-Employment Ban on Lobbying the White House or Federal Government on behalf of any clients after she leaves the White House.