

July 7, 2025

The Honorable Warren Davidson  
U.S. House of Representatives  
2113 Rayburn HOB  
Washington, DC 20515

The Honorable Sarah Jacobs  
U.S. House of Representatives  
2348 Rayburn HOB  
Washington, DC 20515

The Honorable Pramila Jayapal  
U.S. House of Representatives  
2346 Rayburn HOB  
Washington, DC 20515

Dear Representatives Davidson, Jacobs, and Jayapal,

Transparency International U.S. (“TI US”) commends the introduction of H.R. 3582, the *No Revolving Door in Foreign Military Sales (FMS) Act of 2025*.<sup>1</sup> As part of the largest global coalition dedicated to fighting corruption with over 115 chapters worldwide, we support this important initiative to protect the integrity of the global arms trade and stem the undue influence of foreign governments.<sup>2</sup>

In particular, this legislation takes a critical step toward reducing the improper influence of former U.S. government officials on U.S. arms export decisions. Too often, officials from the U.S. Departments of State and Defense leave public service and accept positions with U.S. or foreign companies that seek to use these former official’s insider knowledge and personal relationships to sway U.S. arms export decisions. **Current federal law generally only imposes a one-year cooling-off period for U.S. officials—leaving open significant opportunities for undue influence.**<sup>3</sup>

The limited scope of U.S. revolving door safeguards can impair U.S. national security-related decisions. For example, in late 2021 a former U.S. Air Force colonel lobbied Congress<sup>4</sup> on behalf of the United Arab Emirates (“UAE”) regarding concerns about a proposed provision in the

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<sup>1</sup> No Revolving Doors in FMS Act of 2025, H.R. 3582, 119<sup>th</sup> Congress (2025).

<sup>2</sup> See “Protect Defense Integrity” Transparency International U.S., available at <https://us.transparency.org/issue/protect-defense-integrity/>; see also Transparency International U.S., “Revolving Door: Fighting Foreign Influence Factsheet,” June 2, 2023, available at <https://us.transparency.org/resource/revolving-door-fighting-foreign-influence-factsheet/>; Transparency International U.S., “New Bipartisan Bill Would Bar Former Military & Political Leaders from Lobbying for Foreign Governments,” June 16, 2022, available at <https://us.transparency.org/news/fighting-foreign-influence-act-statement/>.

<sup>3</sup> See 18 U.S.C § 207 (f). See also Covington and Burling LLP, “Don’t Get Stuck in the Revolving Door: A Primer on Federal Post-Government Employment Restrictions,” Jan. 27, 2025, available at <https://www.cov.com/en/news-and-insights/insights/2025/01/dont-get-stuck-in-the-revolving-door-a-primer-on-federal-post-government-employment-restrictions>.

<sup>4</sup> See Ben Freeman, “The Emirati Lobby in America,” 15, (Quincy Institute, 2022) available at <https://quincyinst.org/research/the-emirati-lobby-in-america/#the-issues>.

annual intelligence bill.<sup>5</sup> The provision would have required a U.S. intelligence study into whether U.S. exported drones had reached Russia or China via the UAE. Despite its potential to expose critical security risks, the provision was stripped from the final version of the bill included in the National Defense Authorization Act of FY 2021.<sup>6</sup> That same colonel also helped push Congress to not block the sale of F-35 fighter jets to the UAE in 2020.<sup>7</sup> The sale, however, was later suspended after the U.S. government expressed concerns that sensitive U.S. technology could be retransferred to China or misused in regional conflicts.

Similar concerns have arisen with dual-use exports. In late 2024, officials at the U.S. Department of Commerce's Bureau of Industry and Security ("BIS") reportedly warned that former BIS employees—now working for the tech industry—maintained inappropriately close relationships with current officials.<sup>8</sup> According to an article by *The New York Times*, this relationship apparently led former BIS officials to provide advance warnings to U.S. companies about forthcoming sanctions on Chinese semiconductor firms.<sup>9</sup> In some cases, the information reached Chinese firms, allowing them to stockpile restricted U.S. products before the sanctions took effect. The frequency with which many U.S. defense companies employ recently departed State Department officials that were involved in U.S. arms transfer decisions also poses risks of undue influence on U.S. arms export decisions.

The *No Revolving Door in FMS Act* would help curb the serious national security and foreign policy risks posed by such influence on U.S. arms export decisions. It would prohibit former State or Defense Department employees who were "involved in any activities related to foreign military sales" from seeking to influence related U.S. government decisions through any communication or appearance before U.S. officials for three years after leaving office on behalf of any U.S. company or foreign governments or entities.<sup>10</sup> Officials that violate this prohibition would be "subject to a fine of \$50,000 and up to five years in prison."<sup>11</sup>

We welcome this important legislation and any opportunity to discuss this issue with you further. Thank you for your consideration of our views. For any questions or additional information, please contact Colby Goodman, Senior Researcher for TI US, at [cgoodman@us.transparency.org](mailto:cgoodman@us.transparency.org).

Sincerely,

Colby Goodman  
Senior Researcher  
Transparency International U.S.

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<sup>5</sup> Intelligence Authorization Act for Fiscal Year 2021, H.R. 7856, 116<sup>th</sup> Congress, § 804, (2020).

<sup>6</sup> William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283.

<sup>7</sup> See Freeman, *supra* note 4.

<sup>8</sup> See Ana Swanson, "How U.S. Firms Battled a Government Crackdown to Keep Tech Sales to China," *N.Y. Times*, December 14, 2024.

<sup>9</sup> *Id.*

<sup>10</sup> No Revolving Doors in FMS Act of 2025, H.R. 3582, 119<sup>th</sup> Congress (2025).

<sup>11</sup> *Id.*