



# Comparing Three Presidential Ethics Pledges

President Biden recently released the Ethics Pledge that will be required of all his appointees. The [Executive Order on Commitments by Executive Branch Personnel](#) was one of the first 17 Executive Orders issued on Inauguration Day. The following chart provides a brief overview comparing President Biden’s Ethics Pledge to that of former Presidents Donald Trump and Barack Obama.

Rule <sup>1</sup>	Biden	Trump	Obama
<p>1. <u>Lobbyist Gift Ban</u></p> <p>Subject to availability of certain exceptions to gift ban, including those based on personal relationships, general discounts, gifts because of a spouse’s business activities or customarily provided in <i>bona fide</i> discussions with a prospective employer, and other exceptions specifically authorized.</p> <p><a href="#">Click here to see a full list</a></p>	✓	✓	✓
<p>2. Reverse <u>Revolving Door Ban - Incoming</u></p> <p>2-year ban on involvement with particular mater with specific party related to official’s former employers or clients</p>	✓	✓	✓

<sup>1</sup> Numbering follows the Biden Ethics Pledge.

Rule	Biden	Trump	Obama
<p><u>3. Reverse Revolving Door Ban – Incoming Lobbyists</u></p> <p>Follows above restriction, plus 2-year look back that would preclude former lobbyist/FARA registrant from participating in (a) particular matter on which they lobbied or engaged in registrable FARA activity, (b) specific issue area in which that particular matter falls, or (c) seeking or accepting employment from agency they previously lobbied or engaged in registrable FARA activity.</p>	✓	Same, but only followed (a).	Same, but no reference to “registrable activity under FARA.”
<p><u>4. Revolving Door Ban – Leaving Government</u></p> <p>Extends one year post-employment restriction of 18 U.S.C. 207(c) to two years.</p> <p>Ban on all ‘lobbying activity’</p>		<p>No, one year only.</p> <p>✓</p>	<p>✓</p> <p>Limited to becoming a registered lobbyist.</p>
<p><u>5. Revolving Door Ban – Senior and Very Senior Appointees Leaving Government</u></p> <p>Agree not to “materially assist” others in making communications or appearances from which official would be prohibited – i.e., ban on “<b>shadow lobbying</b>.”</p>	✓	Not included.	Not included.
<p><u>6. Revolving Door Ban – Appointees Leaving Government to Lobby</u></p> <p>Agree not to lobby or, engage in FARA activity with, a covered executive branch official for longer of remainder of Administration or 2 years.</p>	✓	Same, except FARA registrable activity not covered and time frame of restriction limited to duration of Administration.	Same, except FARA registrable activity not covered and time frame of restriction limited to duration of Administration.
<p><u>7. Golden Parachute Ban</u></p> <p>Agree not accept any salary or other cash (or non-cash) payment from former employer, the availability is limited to individuals accepting a position in the U.S. Government.</p>	✓	Not included.	Not included.