



The Donor-To-Ambassador Pipeline

Why America's Key Diplomats Are Often
Wealthy Political Donors

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TABLE OF CONTENTS

- 04 Executive Summary: The Donor-To-Ambassador Pipeline
- 05 The Campaign Donor-To-Ambassador Problem
- 06 Noncareer Ambassadors and the Modern Presidency
- 07 Consequences of Unqualified Ambassadors
- 08 Ambassadorships During the Biden Administration
- 16 Pathways to Reform
- 18 Conclusion
- 19 Appendix A: Campaign Contributions By President Biden’s Non-Career (Political) Ambassador Nominees
- 21 Appendix B: Language Competencies Among President Biden’s Ambassador Nominees
- 31 Appendix C: Methodology

Executive Summary: The Donor-To-Ambassador Pipeline

Diplomats play a key role in global stability, and the public has a right to know that they are being appointed for their experience and skill, not for how much money they have donated to a president, the president's party, or its candidates. Although federal law explicitly stipulates that "contributions to political campaigns should not be a factor in the appointment" of ambassadors, every Republican and Democratic president of the modern era has appointed ambassadors who were wealthy political donors with limited or nonexistent credentials for foreign service.

This report analyzes this "donor-to-ambassador pipeline" and calls for an end to the practice. The report:

- **Summarizes the history of the donor-to-ambassador pipeline problem in the modern presidency** – This history shows that the average political nominee has been much less qualified than the average career nominee under congressionally approved metrics, including linguistic aptitude, expertise in the receiving state or region, experience in U.S. foreign policy, and organizational leadership. Meanwhile, the average size of campaign contributions from political nominees has increased in recent decades, meaning that the apparent "purchase price" of this government appointment has effectively increased. Occasionally, noncareer ambassador nominees really are highly qualified experts who happen to have never served in the formal diplomatic corps, but they are the exception, not the rule.
- **Provides examples of the consequences for foreign relations and public confidence in government** – Some donor-ambassadors prove so incompetent or unethical in their roles that the State Department's Inspector General is forced to investigate.
- **Studies ten years of campaign contributions by President Biden's ambassador appointees** – Despite then-candidate Joe Biden promising in 2019 that "[n]obody, in fact, will be appointed by me based on anything they contributed," his noncareer political ambassador nominees and their spouses gave at least \$22,511,010.36 to Democratic committees in the ten years prior to their nomination. Of these nominees, 82% contributed at least \$10,000, or bundled at least \$100,000. (Bundling is a practice in which fundraisers collect contributions from others and deliver them in bundles to a campaign.)

Finally, the report explains that, despite the durability of this problem, reform is possible. By improving disclosure and transparency in the appointments process, and by shoring up accountability for ambassadors in office, the U.S. has an opportunity to restore international confidence in the seriousness of our diplomacy.

I. THE CAMPAIGN DONOR-TO-AMBASSADOR PROBLEM

Diplomats play a key role in global stability, and the public has a right to know that they are being appointed for their experience and skills, not for how much money they have donated to a president, his party, or its candidates. Yet every Republican and Democratic president of the modern era has appointed wealthy political donors to ambassadorships regardless of their credentials for foreign service.¹ This “donor-to-ambassador pipeline” is associated with strained foreign relations and diminished public trust in American diplomacy.

The donor-to-ambassador pipeline is especially sordid given that federal law explicitly stipulates “[c]ontributions to political campaigns should not be a factor in the appointment” of ambassadors.² The law stresses that the posts should normally go to career members of the Foreign Service, the corps of highly trained and experienced U.S. diplomats. It permits only that “circumstances will warrant appointments from time to time of qualified individuals who are not career members of the Service.”³

In an effort to ensure that ambassador nominees are truly qualified, federal law provides objective criteria for those qualifications, including “demonstrated competence to perform the duties of a chief of mission, including, to the maximum extent practicable, a useful knowledge of the principal language or dialect of the country in which the individual is to serve, and knowledge and understanding of the history, the culture, the economic and political institutions, and the interests of that country and its people.”⁴ The President is required by law to issue a Certificate of Demonstrated Competence describing every Ambassador nominee’s qualifications.⁵

Despite these statutory safeguards, political nominees often have no substantive diplomatic or foreign policy experience. They may not have even traveled to the country for which they are nominated. Yet they are almost always approved by the Senate. This problem appears to persist despite candidate Joe Biden promising in 2019 that “[n]obody, in fact, will be appointed by me based on anything they contributed.”⁶

This report establishes the need to eliminate the practice of appointing wealthy political donors who lack statutorily required credentials to ambassadorships. First, this report summarizes the history of the donor-to-ambassador pipeline problem throughout modern presidencies of both parties. Second, the report provides examples of the consequences for foreign relations and public confidence in government when unqualified political donors serve as ambassadors. Next, Campaign Legal Center’s (CLC) unprecedented study of ten years of campaign contributions by President Joe Biden’s ambassador appointments shows that noncareer, “political” ambassadors nominated by President Biden contributed (with their spouses) an average of \$409,291.10 to Democratic committees in the ten years

¹ Ryan M. Scoville, *Unqualified Ambassadors*, 69 Duke L.J. 71 (2019), 114.

² 22 U.S.C. § 3944(a)(3).

³ 22 U.S.C. § 3944(a)(2).

⁴ 22 U.S.C. § 3944(a)(1).

⁵ 22 U.S.C. § 3944(a)(4).

⁶ Bill Barrow, *Biden: ‘Best people’ for posts, but they could be donors*, ASSOC. PRESS (Dec. 6, 2019), <https://apnews.com/article/b52f888a8efc85792422fabecd04f608>.

prior to their nomination – at least \$22,511,010.36 in total.⁷

Finally, the report reviews options for reform. By improving disclosure and transparency in the appointments process, and by shoring up accountability for ambassadors in office, the U.S. has an opportunity to restore international confidence in the seriousness of our diplomacy.

II. NONCAREER AMBASSADORS AND THE MODERN PRESIDENCY

A past study of decades of ambassador appointments suggests that the qualifications of political ambassador appointees have declined as their contributions have increased in size – meaning that the soaring cost of presidential elections is effectively degrading the quality of U.S. diplomatic representation.

Ryan Scoville, a law professor at Marquette University, reviewed the history of ambassadorial appointment practices in his 2019 article *Unqualified Ambassadors*.⁸ Based on the qualifications outlined in federal law, Scoville conducted an intensive study of 1,900 ambassadorial nominees from Ronald Reagan's presidency to the first half of Donald Trump's administration. The study concluded that the average political nominee has been much less qualified than the average career nominee under congressionally approved metrics and, insofar as those metrics foreshadowed performance, less effective in office.

This situation is only getting worse: alongside a *rise* in the average size of campaign contributions in recent decades, the qualifications of the average donor-nominee have *fallen* significantly, under several measures. Scoville's findings show, for example, that 73% of political nominees had contributed to the president or affiliated entities an average of \$84,850 each in the four years prior to their nomination, compared to 5% of career nominees who contributed an average of \$33; yet 48% of political nominees had prior foreign policy experience with the federal government, compared to 100% of career nominees, and 15% of political nominees lived or worked in the region to which they were appointed prior to the post, compared to 82% of career nominees.

Occasionally, noncareer ambassador nominees really are highly qualified experts who happen to have never served in the formal diplomatic corps. But they are the exception, not the rule. By demonstrating that political nominees overwhelmingly lack the qualifications of their career counterparts, Scoville's study shows that "unqualified ambassadors" tend to be just that: tycoons and political allies (or their spouses) who are nominated not for their expertise, but because they provided monetary support to the president and/or his party and its candidates, sometimes to the tune of millions of dollars.

⁷ Ambassadors in this study were classified as "Other (Political)" by the American Foreign Service Association. See *Appointments – Joseph R. Biden*, AMERICAN FOREIGN SERVICE ASSOCIATION, <https://afsa.org/appointments-joseph-r-biden> (last visited March 20, 2023).

⁸ Scoville, *supra* note 1.

III. CONSEQUENCES OF UNQUALIFIED AMBASSADORS

Foreign policy experts warn that appointing unqualified campaign donors as ambassadors has deleterious consequences for international relations and public trust in American diplomacy.

Edward L. Peck, a 33-year veteran of the Foreign Service who evaluated more than 150 ambassadorial nominees for the Senate Foreign Relations Committee, has warned that awarding ambassadorships to political fundraisers with little relevant experience results in poor performance or embarrassment on the world stage. “[A]n ambassador’s responsibilities are numerous, complex and important – sometimes critical...they cannot be effectively carried out by beginners,” he writes.⁹

These warnings are based in experience. Some donor-ambassadors have proven so incompetent or unethical in their roles that the State Department’s Inspector General (IG) has been forced to investigate. For example, Cynthia Stroum faced an IG investigation after being appointed Ambassador to Luxembourg by President Obama in 2009.¹⁰ Ms. Stroum had no experience in diplomacy or foreign policy prior to being nominated; she was a venture capitalist¹¹ and theatrical producer¹² who had bundled \$400,000 for Obama’s campaign¹³ and contributed hundreds of thousands of dollars to Democratic committees.¹⁴

Ms. Stroum resigned as ambassador just before the State Department Inspector General released a report lambasting her performance. The IG found that the embassy had performed so poorly under Ms. Stroum that “it plays no significant role in policy advocacy or reporting.”¹⁵ On a personal level, the Ambassador was so “aggressive, bullying, hostile, and intimidating” that “most of the senior staff...either curtailed or volunteered for service in Kabul and Baghdad.”¹⁶ The IG also found that Stroum had mishandled taxpayer funds, spending public money on wine, liquor, and a queen-size mattress she demanded instead of the king-size that was provided to her.¹⁷

Another investigation occurred after Jeffrey Ross Gunter was appointed Ambassador to Iceland by President Donald Trump. Mr. Gunter is a dermatologist who possessed no foreign policy experience

⁹ Edward L. Peck, *Why U.S. Ambassadors Should Be Career Professionals*, AMERICAN FOREIGN SERVICE ASSOCIATION (Jan/Feb 2017), <https://afsa.org/why-us-ambassadors-should-be-career-professionals>.

¹⁰ Cynthia Stroum – Department of State, PN965, 111th Cong. (2009), <https://www.congress.gov/nomination/111th-congress/956?s=1&r=84> (last visited Mar. 20, 2023).

¹¹ Robert J. Hughes, *Les Biz: Broadway’s New Investors*, WALL ST. J., (Jan. 20, 2006), <https://www.wsj.com/articles/SB113771340534051325>.

¹² Producer Credits for Cynthia Stroum, PLAYBILL, <https://www.playbill.com/person/cynthia-stroum-vault-0000023865> (last visited Mar. 20, 2023).

¹³ Obama’s Top Fund-Raisers, N.Y. TIMES (updated Sep. 13, 2012), <https://archive.nytimes.com/www.nytimes.com/interactive/2012/09/13/us/politics/obamas-top-fund-raisers.html>.

¹⁴ Contributions from “Cynthia Stroum,” 2003-4, 2005-6, 2007-8, or 2009-10, FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=cynthia+stroum&two_year_transaction_period=2004&two_year_transaction_period=2006&two_year_transaction_period=2008&two_year_transaction_period=2010 (last visited Mar. 20, 2023).

¹⁵ U.S. Dept. of State and the Broadcasting Board of Governors Office of Inspector Gen, *Report No. ISP-I-11-17A, Report of Inspection: Embassy Luxembourg* at 5 (Jan. 2011), https://www.stateoig.gov/uploads/report/report_pdf_file/isp-i-11-17a_1.pdf.

¹⁶ *Id.*; Curtailment means shortening an employee’s tour of duty from his or her assignment. See 3 FAM 2442.

¹⁷ *Id.* at 22, 25-6.

before being nominated – and he had never even been to Iceland.¹⁸ Mr. Gunter had, however, contributed widely to Republican candidates,¹⁹ including to Trump-associated committees.

Midway through Mr. Gunter's term, news reports emerged describing an "untenable" work environment in which the Ambassador accused staff of being part of the "deep state" and went through seven Deputy Chiefs of Mission (the "number two" job) in the first fourteen months of his tenure.²⁰ Mr. Gunter abruptly left the country to work remotely from California and refused to return to Iceland until ordered to do so by the Secretary of State.²¹ Tensions ran so high that the State Department's Bureau of European and Eurasian Affairs was instructed to bypass Mr. Gunter and work directly with the Icelandic Ministry of Foreign Affairs to ensure that the U.S. relationship with Iceland was maintained.²² After Mr. Gunter left the ambassadorship, the State Department had to hire a psychologist to help staff recover from the "threatening and intimidating environment" he created.²³

Donor-ambassadors have been appointed to be ambassadors to substantial global powers, and some of the U.S.'s most important allies and neighbors, including the UK, France, Canada and Mexico.²⁴ When ambassadors are appointed with little regard for their actual qualifications for the job, it puts the stability of U.S. alliances, and diplomacy generally, at risk.

Furthermore, donor ambassadors are often unwelcome in their host countries. Former diplomats recounted a 2009 incident in which the head of Sweden's Liberal Party bluntly asked Matthew Barzun, a donor ambassador appointed by President Obama: "What qualifies you to be the US ambassador to our country?"²⁵ An embassy staffer had to deflect the question. "This leader of Sweden was reflecting feelings that, in our experience, are often widely shared by friendly governments and publics in countries that get campaign donors and fundraisers as the U.S. ambassador," wrote the diplomats²⁶. "They don't like being treated as a prize in the U.S. spoils system. They send professional diplomats – not campaign donors – to represent their countries in Washington."²⁷

Lastly, the donor-to-ambassador pipeline can undermine U.S. anticorruption efforts abroad by making entreaties for ethical government appear hypocritical. "Open talk of the sale of public office...inevitably undermines the credibility of America' voice as a champion for good governance," wrote Ambassador Barbara Stephenson, a former President of the American Foreign Service Association and

¹⁸ Emily R. Siegel et al., *Donors to the Trump inaugural committee got ambassador nominations. But are they qualified?*, NBC NEWS (Apr. 3, 2019), <https://www.nbcnews.com/politics/donald-trump/donors-trump-inaugural-committee-got-ambassador-nominations-are-they-qualified-n990116>.

¹⁹ Receipts from "Jeffrey Gunter" or "Jeffrey Ross Gunter", FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=Jeffrey+Gunter&contributor_name=Jeffrey+Ross+Gunter (last visited Mar. 20, 2023).

²⁰ Christina Ruffini, *Controversial U.S. Ambassador to Iceland wanted firearm, security for Reykjavik post*, CBS News (Jul. 26, 2020), <https://www.cbsnews.com/news/controversial-u-s-ambassador-to-iceland-wants-firearm-security-for-reykjavik-post/>.

²¹ *Id.*

²² U.S. Dep't of State Office of Inspector Gen, *Report No. ISP-I-22-02, Inspection of Embassy Reykjavik, Iceland* (Oct. 2021) at 3, https://www.stateoig.gov/uploads/report/report_pdf_file/isp-i-22-02_7.pdf.

²³ *Id.* at 3.

²⁴ See Appendix B for a complete list of political contributions by President Biden's ambassador appointees.

²⁵ Charles Ray and Bob Silverman, "Qualified ambassadors – not campaign donors – should represent US", *The Hill* (Feb. 12, 2021), <https://thehill.com/opinion/international/538574-qualified-ambassadors-not-campaign-donors-should-represent-us/>.

²⁶ *Id.*

²⁷ *Id.*

career diplomat.²⁸ “The fact that the United States stands virtually alone among serious countries in filling ambassadorial positions this way...heightens the tension between what we say and what we do. As advocates for the rule of law abroad, we should keep in mind that our own law is clear on the subject.”²⁹

IV. AMBASSADORSHIPS DURING THE BIDEN ADMINISTRATION

A stark example of the donor-to-ambassador problem from the Biden administration is found in the tale of two Michael Adlers.

Michael J. Adler has the kind of resume one might expect for a United States Ambassador. As a career member of the Senior Foreign Service with more than thirty years of experience, he has held numerous roles in foreign policy and national security, including at the National Security Council and in the State Department, covering Africa, Asia, and the Middle East. President Biden appointed him as Ambassador to South Sudan on January 26, 2022.³⁰

President Biden appointed another Michael Adler – Michael M. Adler – as Ambassador to Belgium on September 22, 2021.³¹ While the two men share a name and are both ambassadors, the similarities end there.

Michael M. Adler has no foreign policy experience and was running a hotel business out of South Florida prior to his nomination,³² while Michael J. Adler was serving abroad in Afghanistan, Lebanon, and Kuwait. Unlike Michael J. Adler – who has not made any political contributions – Michael M. Adler is a generous political donor. He and his wife contributed over \$300,000 to Democratic political committees in the ten years before he was nominated, and he served as national finance chair for President Biden’s 2008 presidential campaign.³³ Most recently, he bundled at least \$100,000 in contributions for President Biden’s 2020 campaign.³⁴

The available facts do not suggest that the contributions analyzed in this report were given in exchange for or because of the promise of an appointment. But they do create a perception that some nominations are a reward for political contributions – a perception that is highly damaging to public trust and attitudes regarding government ethics. This is particularly true when an appointee possesses no foreign service credentials or experience with the country to which they are to be appointed

²⁸ Barbara Stephenson, “Regaining The Moral High Ground: President’s Views”, *The Foreign Service Journal* (Jun. 2016), <https://afsa.org/regaining-moral-high-ground>.

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³⁰ The White House, *President Biden Announces Key Diplomatic Nominees* (Jan. 26, 2022); see also U.S. Dep’t of State, Certificate of Competency for Michael Jonathan Adler, Republic of South Sudan (Feb. 7, 2022) <https://www.state.gov/adler-michael-jonathan-republic-of-south-sudan-february-2022/>.

³¹ The White House, *President Biden Announces Key Nominations* (Sep. 22, 2021), <https://www.whitehouse.gov/briefing-room/statements-releases/2021/09/22/president-biden-announces-key-nominations-2/>.

³² Michael M. Adler, ADLER GROUP, <https://adlergroup.com/michael-m-adler/> (last visited Mar. 20, 2023).

³³ Jacob Kornbluh, *Democratic fundraiser Michael Adler on his support for Biden*, JEWISH INSIDER (Jun. 13, 2019), <https://jewishinsider.com/2019/06/democratic-fundraiser-michael-adler-on-his-support-for-biden/>.

³⁴ See Appendix A.

that would qualify them for the position.

When ambassadors are nominated, they are required by law to submit to Congress a four-year history of political contributions that they and their immediate family members have made. Scholarly analyses of campaign contributions by nominees typically rely on this data. But the numbers are self-reported, and the short timeframe may understate the level of financial involvement by nominees who are longtime donors.

This report improves the data of past analyses by amassing a ten-year history of campaign contributions to Democratic committees by President Biden's political, noncareer ambassador nominees and their spouses, as reported to the Federal Election Commission. The results of CLC's analysis of campaign contributions, considered alongside the President's Certificates of Competency for these nominees, reveal a troubling picture: despite his campaign promise, President Biden has continued the practice of nominating for ambassadorships major donors who lack the qualifications of their Foreign Service counterparts – or even the minimum qualifications outlined under federal law. The unprecedented scope of CLC's data makes clear the scale of political contributions fueling the donor-to-ambassador pipeline on an ongoing basis.

This report also highlights nominees who were “bundlers” for the Biden campaign: individuals or their spouses who serve as major fundraisers by collecting contributions from others and delivering them in bundles to the campaign. President Biden did not release the specific amounts his bundlers raised for his campaign. However, the figures associated with President Obama's campaign – which often ran into the millions – give a clue as to the potential sums President Biden's now-ambassadors may have bundled for his campaign.

In total, President Biden's ambassador nominees and their spouses gave at least \$22,511,010.36 in direct contributions to Democratic committees in the ten years prior to their nomination. In fact, 82% contributed at least \$10,000, or bundled at least \$100,000. And except for Cindy McCain, who serves as Ambassador to the United Nations Agencies for Food and Agriculture, every single “political” ambassador nominee made some contribution to Democratic committees in the ten years prior to their nomination.³⁵

Despite their apparent lack of qualifications, donor-ambassadors are confirmed by the Senate in almost every instance, and President Biden's nominees are no exception. Senators have an incentive to assent to these nominations: the donors up for Ambassador posts often contribute widely to Senatorial campaigns. In fact, CLC has found that in the ten years prior to their nomination, President Biden's political ambassador nominees had contributed \$380,683 just to the campaigns of the ten Democratic senators on the Foreign Relations Committee, before which Ambassador confirmation hearings are held. And donor-ambassadors contribute millions more to super PACs that can raise and spend unlimited sums to help Senators get elected.

³⁵ See Appendix A for contributions data. All of the amounts donated cited in this report are to committees that exclusively support Democrats.

The sample of Biden’s donor-ambassadors highlighted here have all donated or bundled enormous sums to Democratic political committees. This appears to be their primary qualification, as no reasonable interpretation of their resumes would suggest substantive foreign policy experience or country-specific expertise qualifying them for their roles – though some had already served as donor-ambassadors under President Obama.



Scott Miller, Ambassador to Switzerland and Liechtenstein

Amount donated: \$3,324,160.00

Bundled \$100,000+ for Biden campaign

Background: Investment banker

The biggest-dollar donor-ambassador is Scott Miller, an investment banker and major donor to the Democratic Party.³⁶ Mr. Miller and his husband contributed \$3,324,160.00 to Democratic committees in the ten years before he was named Ambassador to Switzerland and Liechtenstein. The State Department’s official profile³⁷ and competency certificate³⁸ for Mr. Miller do not mention any diplomatic or foreign policy experience or ties to Switzerland or Liechtenstein whatsoever, unless his past work in Denver, Colorado as a vice president for Swiss-headquartered investment bank UBS Wealth Management³⁹ counts. Nothing in the public record shows that Mr. Miller knows German or French, the most common languages in Switzerland.⁴⁰ The certificate chiefly describes him as an “activist and philanthropist.” The Millers had previously bundled \$592,850 for President Obama.



Carrin Patman, Ambassador to Iceland

Amount donated: \$2,663,402.34

Bundled \$100,000+ for Biden campaign

Background: Attorney

President Biden’s replacement for Jeffrey Gunther – President Trump’s scandal-plagued donor-Ambassador to Iceland – is Carrin Patman, a lawyer and the former chair of Harris County, Texas’s transit system. Ms. Patman and her husband Jim Derrick contributed \$2,663,402.34 to Democratic commit-

³⁶ Maggie Severns, *Biden reveals deep bench of campaign bundlers*, POLITICO (Dec. 27, 2019), <https://www.politico.com/news/2019/12/27/joe-biden-campaign-bundlers-089918>.

³⁷ Our Relationship – Ambassador Scott C. Miller, U.S. Embassy in Switzerland and Liechtenstein, <https://ch.usembassy.gov/our-relationship/our-ambassador/> (last visited Mar. 20, 2023).

³⁸ U.S. Dep’t of State, Certificate of Competency for Scott Miller, Swiss Confederation and the Principality of Liechtenstein (Jun. 25, 2021), <https://www.state.gov/miller-scott-swiss-confederation-and-the-principality-of-liechtenstein-august-2021>.

³⁹ UBS, *Information on UBS*, <https://www.ubs.com/global/en/legal/info-on-ubs.html> (last visited Mar. 15, 2023).

⁴⁰ See Appendix B, “Language Competencies Among President Biden’s Ambassador Nominees”.

tees in the ten years before her nomination, and bundled at least \$100,000 for President Biden’s campaign. Like other donor-ambassadors, Ms. Patman’s Certificate of Competency did not note any knowledge of or experience in Iceland, or any diplomatic or foreign policy expertise.⁴¹



Constance Milstein, Ambassador to Malta

Amount donated: \$2,151,200

Background: Real estate executive

Constance Milstein and her husband gave \$2,151,200 to Democratic committees in the ten years before Ms. Milstein was nominated by President Biden to be Ambassador to Malta. Prior to her nomination, Ms. Milstein had never served as a foreign policy official; she was a real estate executive who owns a hotel in Washington, DC. Her Certificate of Competency notes that she had hosted “meetings and conferences with world leaders” at several Washington think tanks, and “played key roles” at “many leading nonprofits and NGOs focused on international relations.”⁴² The certificate does not say what those roles were, or list any diplomacy or policy decision-making experience required of a U.S. ambassador, or any ties to Malta.⁴³



David L. Cohen, Ambassador to Canada

Amount donated: \$1,350,361.13

Bundled \$100,000+ for Biden campaign

Background: Comcast executive

Before being nominated Ambassador to Canada, David L. Cohen was a top executive at Comcast, where he oversaw the telecommunications giant’s multimillion-dollar lobbying operation in Washington, DC.⁴⁴ In the ten years prior to his nomination, he and his wife contributed \$1,350,361.13 to Democratic committees, and bundled at least \$100,000 for President Biden’s 2020 campaign. Mr. Cohen had previously bundled \$2,222,850 for President Obama’s two campaigns, giving a clue as to the potential size of his bundling for President Biden.

Mr. Cohen’s Certificate of Competency did not note any particular familiarity with Canada, or any diplomatic or foreign policy experience, stating only that Mr. Cohen “led a broad portfolio of responsibili-

⁴¹ U.S. Dep’t of State, Certificate of Competency for Carrin F. Patman, Republic of Iceland (Mar. 23, 2022), <https://www.state.gov/patman-carrin-f-republic-of-iceland>.

⁴² U.S. Dep’t of State, Certificate of Competency for Constance J. Milstein, Republic of Malta (Jan. 24, 2022), <https://www.state.gov/milstein-constance-j-republic-of-malta>.

⁴³ *Id.*

⁴⁴ Lee Fang, *JOE BIDEN LAUNCHES PRESIDENTIAL BID WITH FUNDRAISER FILLED WITH CORPORATE LOBBYISTS AND GOP DONORS*, THE INTERCEPT (Apr. 25, 2019), <https://theintercept.com/2019/04/25/joe-biden-presidential-bid-lobbyists-fundraiser/>

ties, including domestic and international government and regulatory affairs, corporate communications, legal affairs, corporate administration, and community impact.”⁴⁵



George Tsunis, Ambassador to Greece

Amount donated: \$1,297,060

Background: Hotel company CEO

One of President Biden’s donor-ambassadors was confirmed only after having been rejected previously for another ambassadorship. George Tsunis, a lawyer and hotel developer,⁴⁶ was first nominated to be Ambassador to Norway in 2014 by President Obama, after he bundled \$854,625 in contributions for the former President,⁴⁷ in addition to hundreds of thousands of dollars he and his wife contributed to the Obama Victory Fund and other Democratic committees.⁴⁸

During Tsunis’s first confirmation hearing, he admitted that he had never been to Norway, incorrectly asserted that the country has a president, and called one of the country’s top political parties a “fringe element” that “spews hatred,” prompting an apology from the U.S. Embassy. Tsunis was denounced by the Scandinavian-American community and lampooned on television.⁴⁹ He later withdrew his nomination.⁵⁰

Yet Mr. Tsunis continued making hundreds of thousands of dollars in contributions to Democratic committees. When Biden became President, he nominated Tsunis to be Ambassador to Greece; apart from Tsunis’ Greek heritage and fluency in the language, his Certificate of Competency did not note any foreign service qualifications. However, at the time he was nominated, Tsunis and his wife had made \$1,297,060 in contributions to Democratic committees over a ten-year period. The Senate confirmed Tsunis on March 10, 2022.⁵¹

⁴⁵ U.S. Dep’t of State, Certificate of Competency, David L. Cohen, Canada (Aug. 3, 2021), <https://www.state.gov/cohen-david-l-canada-august-2021>.

⁴⁶ Our Relationship – Ambassador George J. Tsunis, U.S. Embassy, and Consulate in Greece, <https://gr.usembassy.gov/our-relationship/our-ambassador/> (last visited Mar. 20, 2023).

⁴⁷ Barack Obama’s Bundlers, OPENSECRETS, <https://www.opensecrets.org/pres12/bundlers.php> (last visited Mar. 20, 2023).

⁴⁸ Receipts for “George Tsunis” or “Olga Tsunis,” 2007-08 or 2011-12, FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=george+tsunis&contributor_name=olga+tsunis&two_year_transaction_period=2008&two_year_transaction_period=2012 (last visited Mar. 20, 2023).

⁴⁹ Brett Neely, *The Would-Be Ambassador To Norway Who Has Never Been There Himself*, NPR (June 17, 2014), <https://www.npr.org/2014/06/17/323032817/the-would-be-ambassador-to-norway-whos-never-been-there-himself>.

⁵⁰ Paul Richter, *Obama donor George Tsunis ends his nomination as Norway ambassador*, L.A. TIMES (Dec. 13, 2014), <https://www.latimes.com/world/europe/la-fg-norway-ambassador-nominee-withdraws-20141213-story.html>.

⁵¹ George J. Tsunis – Department of State, PN1255, 117th Congress (2022), <https://www.congress.gov/nomination/117th-congress/1255?q=%7B%22search%22%3A%5B%22tsunis%22%2C%22tsunis%22%5D%7D&s=2&r=1> (last visited Mar. 20, 2023).



Margaret “Meg” Whitman, Ambassador to Kenya

Amount donated: \$1,055,500.00

Background: CEO, eBay and HP; Republican politician

President Biden nominated Meg Whitman, a former Republican candidate for President and CEO of Hewlett-Packard and eBay among other companies, to be Ambassador to Kenya – ostensibly because she had worked with “heads of state, other senior government officials and business leaders across the globe.” Her Certificate of Competency, however, did not mention any expertise or experience in Kenya, or Africa at all.⁵² In addition to her financial support for Democrats, Whitman crossed party lines to endorse President Biden in 2020.⁵³



Jane Hartley, Ambassador to the United Kingdom

Amount donated: \$975,160.00

Bundled \$100,000+ for Biden campaign

Background: Advisory firm CEO; marketing; communications; former donor-ambassador

Jane Hartley was originally appointed by President Obama to be Ambassador to France in 2014. Hartley had fundraised \$2,246,921 for the former President across his two campaigns.⁵⁴ Previously, she was the CEO of an economic and political advisory firm,⁵⁵ and a board member at an executive search firm.⁵⁶ Her certificate of competency noted that she “speaks conversational French” and “has been the CEO of macroeconomic and political advisory firms for the past two decades.”⁵⁷ Beyond the two advisory firms, her professional experience lies in marketing and communications for TV broadcasters and political roles in the Carter administration and at the Democratic National Committee.

On January 19, 2022, President Biden nominated Ms. Hartley to be Ambassador to the United Kingdom, a position first held by John Adams.⁵⁸ Ms. Hartley was nominated after she and her husband Ralph Schlosstein, an investment bank CEO, contributed \$975,160 to Democratic committees over a

⁵² U.S. Dep’t of State, Certificate of Competency, Margaret C Whitman, Republic of Kenya (Dec. 17, 2021), <https://www.state.gov/whitman-margaret-c-republic-of-kenya-december-2021>.

⁵³ Carla Marinucci, *Former GOP gubernatorial candidate Whitman endorses Biden at DNC*, POLITICO (Aug. 17, 2020), <https://www.politico.com/states/california/story/2020/08/17/former-gop-gubernatorial-candidate-whitman-endorses-biden-at-dnc-1309809>.

⁵⁴ *Obama’s Top Fund-Raisers*, *supra* note 13.

⁵⁵ U.S. Dep’t of State, Certificate of Competency for Jane D. Hartley, French Republic (July 2014), <https://2009-2017.state.gov/m/dg/hr/coc/2014/229257.htm>, see also Observatory Group LLC, BLOOMBERG, <https://www.bloomberg.com/profile/company/0294273Z:US> (last visited Mar. 20, 2023).

⁵⁶ *Id.*, see also About Heidrick & Struggles, <https://www.heidrick.com/en/> (last visited Mar. 20, 2023).

⁵⁷ See Certificate of Competency for Jane D. Hartley, *supra* note 30.

⁵⁸ The National Archives, *Eyewitness: Personal Encounters, John Adams – Audience with King George III, 1785*, <https://www.archives.gov/exhibits/eyewitness/html.php?section=19> (last visited Mar. 20, 2023).

10-year period and fundraised at least \$100,000 for President Biden’s 2020 campaign. She replaced Chargé d’Affairs Philip T. Reeker, a 30-year veteran of the Foreign Service.⁵⁹



Jamie Harpootlian, Ambassador to Slovenia

Amount donated: \$949,566.00

Spouse bundled \$100,000+ for Biden campaign

Background: Attorney

President Biden’s Ambassador to Slovenia, Jamie Harpootlian, and her husband personally contributed \$949,566.00 to Democratic committees in the ten years prior to her nomination and bundled at least \$100,000 for President Biden’s 2020 campaign. Her Certificate of Competency notes that she is an “accomplished attorney” at her husband’s law firm, and a “leader and patron of non-profit groups,” but does not mention any foreign policy experience, ties to Slovenia, or knowledge of the Slovenian language. Her husband had previously bundled \$391,636 for President Obama.⁶⁰



Alan Leventhal, Ambassador to Denmark

Amount donated: \$920,950.00

Bundled \$100,000+ for Biden campaign

Background: Chairman and CEO of real estate corporation

Before being named Ambassador to Denmark, Mr. Leventhal headed a real estate investment firm dealing in office space in the U.S. Aside from his philanthropic ventures, this was the only professional experience noted in his Certificate of Competency.⁶¹ The brief Certificate does not note any foreign policy or diplomatic experience, ties to Denmark, or knowledge of Danish.

⁵⁹ Tyler Pager and Anne Gearan, *Biden selects Jane Hartley as ambassador to U.K.*, WASH. POST (Jul. 16, 2021), https://www.washingtonpost.com/politics/biden-hartley-uk-ambassador/2021/07/16/78ed02ce-e63b-11eb-934f-7e6c1927f261_story.html; see also U.S. Department of State, People – Philip T. Reeker, <https://www.state.gov/biographies/philip-t-reeker/> (last visited Mar. 20, 2023).

⁶⁰ U.S. Dep’t of State, Certificate of Competency, Jamie L Harpootlian, Republic of Slovenia (Aug. 9, 2021), <https://www.state.gov/harpootlian-jamie-l-republic-of-slovenia-august-2021>.

⁶¹ U.S. Dep’t of State, Certificate of Competency, Alan M. Leventhal, Kingdom of Denmark (Jan. 1, 2022), <https://www.state.gov/leventhal-alan-m-kingdom-of-denmark>.



Randi Charno Levine, Ambassador to Portugal

Amount donated: \$862,331.60

Bundled \$100,000+ for Biden campaign

Background: Art curator

Randi Charno Levine was nominated to be Ambassador to Portugal after she and her husband Jeffrey, a real estate developer,⁶² contributed \$862,331.60 to Democratic committees over a ten-year period and served as major contribution bundlers for the Biden campaign. The State Department’s Certificate of Competency describes her as a “national advocate for the arts, cultural diplomacy leader, and philanthropist.”⁶³

The remainder of the certificate describes her work as a curator and administrator at various museums and her board membership at various nonprofits. It highlights the fact that she chaired the Meridian Center for Cultural Diplomacy, which hosts visual and performing arts exhibitions,⁶⁴ and that she had traveled to China, Italy, Peru, Portugal, and Turkey in her capacity as a major donor and trustee at the New Museum in New York.⁶⁵

The certificate does not note, however, whether Ms. Levine speaks Portuguese or has expertise in Portuguese affairs or any foreign policy.⁶⁶



Marc Stanley, Ambassador to Argentina

Amount donated: \$575,484.26

Bundled \$100,000+ for Biden campaign

Background: Attorney

For Argentina, President Biden selected Marc Stanley, a “longtime Democratic fundraiser”⁶⁷ who, with his wife Wendy, contributed \$575,484.26 to various Democratic committees in the ten years prior to his nomination. Mr. Stanley’s Certificate of Competency does not note any relevant language skills,

⁶² Revolving Door Project, Person of Interest : Randi Levine, <https://therevolvingdoorproject.org/person-of-interest/randi-levine/> (last visited Mar. 20, 2023).

⁶³ U.S. Dep’t of State, Certificate of Competency, Randi Charno Levine, Portuguese Republic (Nov. 12, 2021), <https://www.state.gov/levine-randi-charno-portuguese-republic-november-2021>.

⁶⁴ Meridian International Center, Meridian Center for Cultural Diplomacy, <https://www.meridian.org/staff/mccd/> (last visited Mar. 20, 2023).

⁶⁵ New Museum, *NEW MUSEUM ELECTS NEW MEMBERS TO ITS BOARD OF TRUSTEES, JOINING FOUR OTHER BOARD MEMBERS APPOINTED OVER THE PAST YEAR*, https://235bowery.s3.amazonaws.com/pressreleases/218/New%20Board%20Members%20March%202020_press%20release.pdf (last visited Mar. 20, 2023).

⁶⁶ See *supra* note 59.

⁶⁷ Todd Gillman, *Biden taps Dallas lawyer Marc Stanley as ambassador to Argentina*, DALLAS MORN. NEWS (Aug. 6, 2021), <https://www.dallasnews.com/news/politics/2021/08/06/biden-taps-dallas-lawyer-marc-stanley-as-ambassador-to-argentina/>.

ties to Argentina, or any international or foreign policy experience whatsoever.⁶⁸



Erik Ramanathan, Ambassador to Sweden

Amount donated: \$181,756.60

Bundled \$100,000+ for Biden campaign

Background: Former biotechnology executive

Before he was nominated to be Ambassador to Sweden, Erik Ramanathan and his husband Ranesh contributed \$181,756.60 to Democratic committees in a ten-year period, and bundled at least \$100,000 for President Biden. He also served on the national finance committees for President Biden's campaign and the Democratic National Committee.⁶⁹

The Certificate of Competency for Mr. Ramanathan, a former biotechnology executive, notes no ties to Sweden, knowledge of Swedish, or any foreign policy experience whatsoever. It notes simply that “[h]is long record as a leader and change agent in a broad portfolio of legal, non-profit and public sector organizations makes him well-qualified to serve as U.S. Ambassador to the Kingdom of Sweden.”⁷⁰

V. PATHWAYS TO REFORM

The ongoing issues with donor-ambassadors highlighted above suggest that reforms are needed to improve transparency in the nominations and confirmations process, and to achieve greater accountability for ambassadors in office.

Meaningful Certificates of Demonstrated Competency

Certificates of Competency for donor-ambassadors often show that a nominee lacks the qualifications codified in federal law, but do not say so directly. Instead, the certificate will often boast of the individual's successes in another sector – in business, for instance – while foregoing any mention of their knowledge of the receiving state or region and its languages, or any diplomatic or foreign policy experience.

The law governing these certificates, the Foreign Service Act of 1980, should be amended to require that the certificates specify a nominee's expertise in the language, politics, economics, and history of the country to which they are to be appointed, and how their foreign policy and international affairs

⁶⁸ U.S. Dep't of State, Certificate of Competency, Marc R. Stanley, Argentine Republic (Jun. 25, 2021), <https://www.state.gov/stanley-marc-r-argentine-republic-august-2021>.

⁶⁹ Myah Ward, *Biden nominates longtime allies for 3 ambassadorships*, POLITICO (Sep. 22, 2021), <https://www.politico.com/news/2021/09/22/biden-nominates-allies-ambassadors-513647>.

⁷⁰ U.S. Dep't of State, Certificate of Competency, Erik D. Ramanathan, Kingdom of Sweden (Oct. 6, 2021), <https://www.state.gov/ramanathan-erik-d-kingdom-of-sweden-october-2021>.

experience qualifies them to be a U.S. Ambassador. If a nominee lacks those qualifications, the certificate should say so explicitly. Further, it should state whether there is a career member of the Foreign Service available for the post, and why the noncareer, “political” nominee is being chosen instead.

Transparency for Contributions and Bundlers

Prospective ambassadors’ contribution reports before the Senate should extend to a ten-year period to give Senators and the public a more complete view of the nominee’s (and their family’s) financial involvement in politics. This data should not be self-reported, but rather pulled by the Senate directly from Schedule A receipts reported to the Federal Election Commission by the recipient committees. In addition, a nominee’s history as a bundler over the same ten-year period should be disclosed, including the specific amounts they bundled and for which candidates.

The Role of the Senate

For too long, members of Congress have accepted the donor-to-ambassador pipeline as a status quo. The Senate confirms donor-ambassadors in all but a select few cases. Presidents, of course, must stop engaging in this corrupt and illegal practice, but senators could stop it today by simply declining to confirm ambassadors who are not meaningfully qualified. Additionally, a blue ribbon commission of past career diplomats could provide guidelines for confirmation hearings, including minimum questions that must be asked and formally answered.

Appointing an Inspector General of the Department of State

The Department of State Office of the Inspector General has been without a Senate-confirmed chief for over 1,000 days as of this writing, since President Trump fired Inspector General Steve Linick.⁷¹ The department has since been operating with a series of acting Inspectors General.⁷² President Biden has not even nominated a replacement. Appointing a Senate-confirmed Inspector General is a basic step the President and Senate should take to demonstrate their seriousness about accountability at the State Department.

Improving Department of State Inspector General Inspections Processes

Until Congress amends the Foreign Service Act to require more transparency in donor-ambassador contribution data, the Department of State should consider improving the process for ensuring ambassadors are not perpetrating fraud, waste, and abuse as a result of a lack in competency. Increased oversight of ambassadors can also act as a deterrent to the donor-to-ambassador pipeline: additional public scrutiny of incompetent ambassadors, who can hide behind gaps in oversight, could deter

⁷¹ Press Release, House Foreign Affairs Committee, Engel Remarks at Hearing on Firing of the State Department Inspector General, <https://web.archive.org/web/20220925065317/https://foreignaffairs.house.gov/2020/9/engel-remarks-at-hearing-on-firing-of-the-state-department-inspector-general> (last visited Mar. 20, 2023); see also Oversight.gov, *Inspector General Vacancies*, <https://www.oversight.gov/ig-vacancies> (last visited Apr. 5, 2023).

⁷² Department of State Office of Inspector General, *Diana Shaw, Deputy Inspector General performing the duties of the Inspector General*, <https://www.stateoig.gov/about/meet-the-ig> (last visited Mar. 20, 2023).

presidents from appointing unqualified donors in the first place.

If the donor-ambassador issues under previous presidents are any predictor, it is likely that at least one of President Biden's appointees will face a reprimand from the Inspector General during their tenure. But Congress, and voters, may not know of issues with these ambassadors until well after the damage is done – if ever – because the Inspector General is only required to review foreign posts once every five years.⁷³ By that time, a donor-ambassador may have already left their position.

Because it would not be feasible for the Inspector General to annually and thoroughly review all 192 United States foreign posts with an ambassador, the State Department should put another system in place to trigger an investigation of a post. This could be done through the deployment of a regular required survey of staff that could trigger an investigation of an ambassador if the answers raise red flags about an ambassador's competency.

At a minimum, embassy staff should receive training in appropriate and inappropriate conduct that emphasizes the availability of the Inspector General hotline and the obligation to make use of it if misconduct is occurring – including by the ambassador. When the IG is alerted to potential issues by embassy staff, it should notify the Secretary of State and the Senate Foreign Relations Committee immediately and explain why it is or is not undertaking an inspection of the post. Inspection reports by the State IG should be made public anytime classified or diplomatically sensitive information is not at serious risk.

While this solution does not directly prevent the perpetuation of the donor-to-ambassador pipeline, it can assist with bringing any egregious conduct by donor-ambassadors to the public's attention; the additional public scrutiny may deter future presidents from appointing unqualified donors.

VI. CONCLUSION

The upcoming 2024 election is almost certain to be the most expensive in history, and there will likely be more deep-pocketed donors than ever to clamor for ambassadorial posts. This election will also be held against a backdrop of global political instability, war, and the rising threat of authoritarianism worldwide. International engagement by experienced ambassadors could not be more crucial in this precarious global context.

The donor-to-ambassador pipeline has caused incalculable damage to public trust by creating a widespread perception that many diplomats are selected because of their campaign contributions, not because of their experience and skills. The American people have a right to know that all public officials, regardless of whether they serve at home or abroad, are appointed based on merit, not be-

⁷³ 22 U.S.C. 3929(a)(1).

cause of how much money they donated to a President or candidates the President supports. It is essential that Congress and the executive branch work to end the donor-to-ambassador pipeline now to restore faith in American diplomacy.

**Appendix A: Campaign Contributions By President Biden's Non-Career (Political)
Ambassador Nominees**

Country	Nominee	Contributions to Democratic committees by individual and spouse in 10 years prior to announcement of nomination	Nominee or spouse bundled at least \$100,000 for President Biden's 2020 campaign
Switzerland & Liechtenstein	Scott Miller	\$ 3,324,160.00	Y
Iceland	Carrin F. Patman	\$ 2,663,402.34	Y
Malta	Constance Milstein	\$ 2,151,200.00	N
Norway	Marc Nathanson	\$ 1,689,071.23	Y
Canada	David Cohen	\$ 1,350,361.13	Y
Greece	George Tsunis	\$ 1,297,060.00	N
Kenya	Margaret 'Meg' Whitman	\$ 1,055,500.00	N
United Kingdom	Jane Hartley	\$ 975,160.00	Y
Brazil	Elizabeth Frawley Bagley	\$ 966,958.99	Y
Slovenia	Jamie L. Harpootlian	\$ 949,566.00	Y
Denmark	Alan Leventhal	\$ 920,950.00	Y
Portugal	Randi Charno Levine	\$ 862,331.60	Y
Czech Republic	Bijan Sabet	\$ 720,967.91	Y
Argentina	Marc Stanley	\$ 575,484.26	Y
Finland	Douglas T. Hickey	\$ 430,004.71	Y
Costa Rica	Cynthia Ann Telles	\$ 427,367.53	Y
Belgium	Michael Adler	\$ 301,275.00	Y
Australia	Caroline Kennedy	\$ 238,438.75	N
UN / Human Rights Council	Michèle Taylor	\$ 220,247.33	Y
Sweden	Erik Ramanathan	\$ 181,756.60	Y
UN / Management & Reform	Christopher Lu	\$ 162,887.47	Y
Austria	Victoria Reggie Kennedy	\$ 147,475.00	Y
Mexico	Kenneth Lee Salazar	\$ 132,718.95	Y
Singapore	Jonathan Eric Kaplan	\$ 104,800.00	Y
Israel	Thomas Nides	\$ 98,925.00	Y
Netherlands	Shefali Razdan Duggal	\$ 93,656.13	Y
Panama	Mari Carmen Aponte	\$ 60,225.00	N
Bahamas	Calvin Smyre	\$ 55,886.23	N

Country	Nominee	Contributions to Democratic committees by individual and spouse in 10 years prior to announcement of nomination	Nominee or spouse bundled at least \$100,000 for President Biden's 2020 campaign
India	Eric Garcetti	\$ 51,152.94	Y
Spain & Andorra	Julissa Reynoso Pantaleon	\$ 42,941.83	N
France & Monaco	Denise Bauer	\$ 39,517.00	Y
OECD	Jack Markell	\$ 29,650.00	Y
European Union	Mark Gitenstein	\$ 22,615.00	Y
Hungary	David Pressman	\$ 22,000.00	N
Trinidad and Tobago	Candace A. Bond	\$ 20,862.90	N
ICAO	C.B. 'Sully' Sullenberger	\$ 20,100.00	N
Holy See	Joseph Donnelly	\$ 13,671.47	Y
Japan	Rahm Emanuel	\$ 13,125.00	N
UN / Vienna / IAEA	Laura S.H. Holgate	\$ 12,951.20	N
ASEAN	Yohannes Abraham	\$ 10,932.50	N
NATO	Julianne Smith	\$ 10,515.45	N
OAS	Francisco O. Mora	\$ 10,250.00	N
South Africa	Reuben E. Brigety, II	\$ 7,970.00	N
Tanzania	Michael Battle	\$ 3,677.00	N
UN / Geneva	Bathsheba Nell Crocker	\$ 3,645.19	N
New Zealand & Samoa	Tom Udall	\$ 3,549.00	Y
Ireland	Claire Cronin	\$ 3,360.58	Y
Jamaica	N. Nickolas Perry	\$ 2,834.00	N
Belize	Michelle Kwan	\$ 2,358.00	N
Luxembourg	Thomas Barrett	\$ 2,083.73	Y
Morocco	Puneet Talwar	\$ 1,380.00	N
Turkey	Jeffry Lane Flake	\$ 1,015.00	N
Poland	Mark Brzezinski	\$ 515.41	N
Germany	Amy Gutmann	\$ 500.00	N
UN / Rome	Cindy Hensley McCain	\$ -	N
<i>Average</i>		\$ 409,291.10	

Appendix B: Language Competencies Among President Biden’s Ambassador Nominees

Country	Principal languages of receiving state (from CIA World Factbook)	Nominee	Languages noted on Certificate of Competency	Non-English Destination Where Ambassador Lacks Destination Language Competency ⁷⁴
Argentina	Spanish (official), Italian, English, German, French, indigenous (Mapudungun, Quechua) (Minority language: http://obiret-iesalc.udg.mx/sites/default/files/publicaciones/42_english_in_argentina.pdf)	Marc Stanley	none	yes
Australia	English 72.7%, Mandarin 2.5%, Arabic 1.4%, Cantonese 1.2%, Vietnamese 1.2%, Italian 1.2%, Greek 1%, other 14.8%, unspecified 6.5% (2016 est.)	Caroline Kennedy	none	no
Austria	German (official nationwide) 88.6%, Turkish 2.3%, Serbian 2.2%, Croatian (official in Burgenland) 1.6%, other (includes Slovene, official in southern Carinthia, and Hungarian, official in Burgenland) 5.3% (2001 est.)	Victoria Reggie Kennedy	none	yes
Bahamas	English (official), Creole (among Haitian immigrants)	Calvin Smyre	none	no
Belgium	Dutch (official) 60%, French (official) 40%, German (official) less than 1%	Michael Adler	none	yes
Belize	English 62.9% (official), Spanish 56.6%, Creole 44.6%, Maya 10.5%, German 3.2%, Garifuna 2.9%, other 1.8%, unknown 0.5%; note - shares sum to more than 100% because some respondents gave more than one answer on the census (2010 est.)	Michelle Kwan	Chinese	no
Brazil	Portuguese (official and most widely spoken language); note - less common languages include Spanish (border areas and	Elizabeth Frawley Bagley	none	yes

⁷⁴ Not Official, Less Than 50% Non-Plurality If Delineated, or "Less Common", etc.

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	schools), German, Italian, Japanese, English, and a large number of minor Amerindian languages			
Canada	English (official) 58.7%, French (official) 22%, Punjabi 1.4%, Italian 1.3%, Spanish 1.3%, German 1.3%, Cantonese 1.2%, Tagalog 1.2%, Arabic 1.1%, other 10.5% (2011 est.)	David Cohen	none	no
Costa Rica	Spanish (official), English	Cynthia Ann Telles	Spanish	no
Czech Republic	Czech (official) 88.4%, Slovak 1.5%, other 2.6%, unspecified 7.2% (2021 est.)	Bijan Sabet	none	yes
Denmark	Danish, Faroese, Greenlandic (an Inuit dialect), German (small minority); note - English is the predominant second language	Alan Leventhal	none	no
Finland	Finnish (official) 86.5%, Swedish (official) 5.2%, Russian 1.6%, other 6.7% (2021 est.)	Douglas T. Hickey	none	yes
France & Monaco	French (official) 100%, declining regional dialects and languages (Provençal, Breton, Alsatian, Corsican, Catalan, Basque, Flemish, Occitan, Picard); note - overseas departments: French, Creole patois, Mahorian (a Swahili dialect); French (official), English, Italian, Monegasque	Denise Bauer	French	no
Germany	German (official); note - Danish, Frisian, Sorbian, and Romani are official minority languages; Low German, Danish, North Frisian, Sater Frisian, Lower Sorbian, Upper Sorbian, and Romani are recognized as regional languages under the European Charter for Regional or Minority Languages	Amy Gutmann	none	yes
Greece	Greek (official) 99%, other (includes English and French) 1%	George Tsunis	Greek	no
Holy See	Italian, Latin, French, various other	Joseph Donnelly	none	yes

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	languages			
Hungary	Hungarian (official) 99.6%, English 16%, German 11.2%, Russian 1.6%, Romanian 1.3%, French 1.2%, other 4.2%; note - shares sum to more than 100% because some respondents gave more than one answer on the census; Hungarian is the mother tongue of 98.9% of Hungarian speakers (2011 est.)	David Pressman	none	yes
Iceland	Icelandic, English, Nordic languages, German	Carrin F. Patman	none	no
India	Hindi 43.6%, Bengali 8%, Marathi 6.9%, Telugu 6.7%, Tamil 5.7%, Gujarati 4.6%, Urdu 4.2%, Kannada 3.6%, Odia 3.1%, Malayalam 2.9%, Punjabi 2.7%, Assamese 1.3%, Maithili 1.1%, other 5.6%; note - English enjoys the status of subsidiary official language but is the most important language for national, political, and commercial communication; there are 22 other officially recognized languages: Assamese, Bengali, Bodo, Dogri, Gujarati, Hindi, Kannada, Kashmiri, Konkani, Maithili, Malayalam, Manipuri, Nepali, Odia, Punjabi, Sanskrit, Santali, Sindhi, Tamil, Telugu, Urdu; Hindustani is a popular variant of Hindi/Urdu spoken widely throughout northern India but is not an official language (2011 est.)	Eric Garcetti	Spanish	no
Ireland	English (official, the language generally used), Irish (Gaelic or Gaeilge) (official, spoken by approximately 39.8% of the population as of 2016; mainly spoken in areas along Ireland's western coast known as gaeltachtaí, which are officially recognized regions	Claire Cronin	none	no

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	where Irish is the predominant language)			
Israel	Hebrew (official), Arabic (special status under Israeli law), English (most commonly used foreign language)	Thomas Nides	none	no
Jamaica	English, English patois	N. Nickolas Perry	none	no
Japan	Japanese	Rahm Emanuel	none	yes
Kenya	English (official), Kiswahili (official), numerous indigenous languages	Margaret 'Meg' Whitman	none	no
Luxembourg	Luxembourgish (official administrative and judicial language and national language (spoken vernacular)) 55.8%, Portuguese 15.7%, French (official administrative, judicial, and legislative language) 12.1%, German (official administrative and judicial language) 3.1%, Italian 2.9%, English 2.1%, other 8.4% (2011 est.)	Thomas Barrett	none	yes
Malta	Maltese (official) 90.1%, English (official) 6%, multilingual 3%, other 0.9% (2005 est.)	Constance Milstein	French and Italian	yes
Mexico	Spanish only 93.8%, Spanish and indigenous languages 5.4%, indigenous only 0.6%, unspecified 0.2%; note - indigenous languages include various Mayan, Nahuatl, and other regional languages (2020 est.)	Kenneth Lee Salazar	Spanish	no
Morocco	Arabic (official), Berber languages (Tamazight (official), Tachelhit, Tarifit), French (often the language of business, government, and diplomacy); note - the proportion of Berber speakers is disputed; does not include data from	Puneet Talwar	none	yes

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	the former Western Sahara			
Netherlands	Dutch (official); note - Frisian is an official language in Fryslan province; Frisian, Low Saxon, Limburgish, Romani, and Yiddish have protected status under the European Charter for Regional or Minority Languages; Dutch is the official language of the three special municipalities of the Caribbean Netherlands; English is a recognized regional language on Sint Eustatius and Saba; Papiamentu is a recognized regional language on Bonaire	Shefali Razdan Duggal	none	yes
New Zealand & Samoa	English (de facto official) 95.4%, Maori (de jure official) 4%, Samoan 2.2%, Northern Chinese 2%, Hindi 1.5%, French 1.2%, Yue 1.1%, New Zealand Sign Language (de jure official) 0.5%, other or not stated 17.2% (2018 est.) note: shares sum to 124.1% due to multiple responses on the 2018 census	Tom Udall	none	no
Norway	Bokmal Norwegian (official), Nynorsk Norwegian (official), small Sami- and Finnish-speaking minorities; note - Sami has three dialects: Lule, North Sami, and South Sami; Sami is an official language in nine municipalities in Norway's three northernmost counties: Finnmark, Nordland, and Troms	Marc Nathanson	none	yes

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
Panama	Spanish (official), indigenous languages (including Ngabere (or Guaymi), Buglere, Kuna, Embera, Wounaan, Naso (or Teribe), and Bri Bri), Panamanian English Creole (similar to Jamaican English Creole; a mixture of English and Spanish with elements of Ngabere; also known as Guari Guari and Colon Creole), English, Chinese (Yue and Hakka), Arabic, French Creole, other (Yiddish, Hebrew, Korean, Japanese); note - many Panamanians are bilingual	Mari Carmen Aponte	Spanish and French	no
Poland	Polish (official) 98.2%, Silesian 1.4%, other 1.1%, unspecified 1.3%; note - data represent the language spoken at home; shares sum to more than 100% because some respondents gave more than one answer on the census; Poland ratified the European Charter for Regional or Minority Languages in 2009 recognizing Kashub as a regional language, Czech, Hebrew, Yiddish, Belarusian, Lithuanian, German, Armenian, Russian, Slovak, and Ukrainian as national minority languages, and Karaim, Lemko, Romani (Polska Roma and Bergitka Roma), and Tatar as ethnic minority languages (2011 est.)	Mark Brzezinski	None	no (reporting indicates he speaks fluent Polish) ⁷⁵
Portugal	Portuguese (official), Mirandese (official, but locally used)	Randi Charno Levine	none	yes
Singapore	English (official) 48.3%, Mandarin (official) 29.9%, other Chinese dialects (includes Hokkien, Cantonese, Teochew, Hakka) 8.7%, Malay (official) 9.2%, Tamil (official) 2.5%,	Jonathan Eric Kaplan	None	no

⁷⁵ Max Tani & Alex Thompson, A New Brzezinski takes the world stage, POLITICO (Mar. 9, 2022), <https://www.politico.com/newsletters/west-wing-playbook/2022/03/09/a-brzezinski-takes-the-world-stage-again-00015852>.

Country	Principal languages of receiving state (from CIA World Factbook)	Nominee	Languages noted on Certificate of Competency	Non-English Destination Where Ambassador Lacks Destination Language Competency ⁷⁴
	other 1.4%; note - data represent language most frequently spoken at home (2020 est.)			
Slovenia	Slovene (official) 87.7%, Croatian 2.8%, Serbo-Croatian 1.8%, Bosnian 1.6%, Serbian 1.6%, Hungarian 0.4% (official, only in municipalities where Hungarian national communities reside), Italian 0.2% (official, only in municipalities where Italian national communities reside), other or unspecified 3.9% (2002 est.)	Jamie L. Harpootlian	Basic French	yes
South Africa	isiZulu (official) 25.3%, isiXhosa (official) 14.8%, Afrikaans (official) 12.2%, Sepedi (official) 10.1%, Setswana (official) 9.1%, English (official) 8.1%, Sesotho (official) 7.9%, Xitsonga (official) 3.6%, siSwati (official) 2.8%, Tshivenda (official) 2.5%, isiNdebele (official) 1.6%, other (includes Khoi, Nama, and San languages) 2%; note - data represent language spoken most often at home (2018 est.)	Reuben E. Brigety, II	Spanish, French, and Amharic	no
Spain & Andorra	Castilian Spanish (official nationwide) 74%, Catalan (official in Catalonia, the Balearic Islands, and the Valencian Community (where it is known as Valencian)) 17%, Galician (official in Galicia) 7%, Basque (official in the Basque Country and in the Basque-speaking area of Navarre) 2%, Aranese (official in the northwest corner of Catalonia (Vall d'Aran) along with Catalan, <5,000 speakers); note - Aragonese, Aranese Asturian, Basque, Calo, Catalan, Galician, and Valencian are recognized as	Julissa Reynoso Pantaleon	Spanish	no

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	regional languages under the European Charter for Regional or Minority Languages; Catalan (official), French, Castilian, Portuguese			
Sweden	Swedish (official) note: Finnish, Sami, Romani, Yiddish, and Meankieli are official minority languages	Erik Ramanathan	none	yes
Switzerland & Liechtenstein	German (or Swiss German) (official) 62.1%, French (official) 22.8%, Italian (official) 8%, English 5.7%, Portuguese 3.5%, Albanian 3.3%, Serbo-Croatian 2.3%, Spanish 2.3%, Romansh (official) 0.5%, other 7.9%; note - German, French, Italian, and Romansh are all national and official languages; shares sum to more than 100% because respondents could indicate more than one main language (2019 est.); German 91.5% (official) (Alemannic is the main dialect), Italian 1.5%, Turkish 1.3%, Portuguese 1.1%, other 4.6% (2015 est.)	Scott Miller	none	yes
Tanzania	Kiswahili or Swahili (official), Kiunguja (name for Swahili in Zanzibar), English (official, primary language of commerce, administration, and higher education), Arabic (widely spoken in Zanzibar), many local languages; note - Kiswahili (Swahili) is the mother tongue of the Bantu people living in Zanzibar and nearby coastal	Michael Battle	none	no

<i>Country</i>	<i>Principal languages of receiving state (from CIA World Factbook)</i>	<i>Nominee</i>	<i>Languages noted on Certificate of Competency</i>	<i>Non-English Destination Where Ambassador Lacks Destination Language Competency⁷⁴</i>
	Tanzania; although Kiswahili is Bantu in structure and origin, its vocabulary draws on a variety of sources including Arabic and English; it has become the lingua franca of central and eastern Africa; the first language of most people is one of the local languages			
Trinidad and Tobago	English (official), Trinidadian Creole English, Tobagonian Creole English, Caribbean Hindustani (a dialect of Hindi), Trinidadian Creole French, Spanish, Chinese	Candace A. Bond	none	no
Turkey	Turkish (official), Kurdish, other minority languages	Jeffrey Lane Flake	Afrikaans	yes
United Kingdom	English	Jane Hartley	none	no

Appendix C: Methodology

The study of campaign contributions used the classification of nominations by the American Foreign Service Association as a basis for research.⁷⁶

Publicly available contribution data from the Federal Election Commission was collected for every nominee coded by AFSA as “Other (Political)”. Data was collected for the ten years prior to the date that the White House announced the nomination in a press release, rather than the date the nomination was formally sent to the Senate, since decision-making in the nominations process is of interest. This data was first cleaned to ensure that the contributions were made by the individuals in question by cross-referencing the addresses and employment listed with each contribution with their Certificates of Demonstrated Competency, news articles, and public records. These sources were also checked to determine the spouses of the nominees, for whom contributions data was also collected. Next, the data was cleaned to remove the “duplicate” contribution entries created by earmarked contributions, and contributions to Republican committees or committees which spend to support both Democrats and Republicans. Finally, the data was audited for errors in FEC data and summed.

Roger Nyhus, to be Ambassador to Barbados, was nominated after the conclusion of this study and is not included in the dataset.

Individual contributions (not through conduits such as ActBlue or WinRed) under \$200 are not itemized by committees in FEC reporting and are thus not included in this analysis. The lone noncareer nominee identified as making no contributions in FEC data – Cindy McCain – also did not report making contributions before the Senate.

For language competencies, the CIA World Factbook was used to determine the principal languages of the receiving state. These entries were compared with Certificates of Competency for each Ambassador. “Non-English destinations” were coded for those countries where English was not an official language, where less than a majority, and not a plurality, of people speak English, or where the CIA noted that it is “less common.” The table notes which language competencies were stated on each Certificate of Competency, and where an Ambassador appears to lack language skills in a non-English speaking destination. Language competencies were not tabulated for candidates to be Ambassador to intergovernmental organizations.

⁷⁶ American Foreign Service Association, *Appointments – Joseph R. Biden*, <https://afsa.org/appointments-joseph-r-biden> (last visited Mar. 20, 2023).