



# **The Military-Industrial-Think Tank Complex**

## **Conflicts of Interest at the Center for a New American Security**

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# Introduction

Since its founding in 2007, the bipartisan think tank Center for a New American Security (CNAS) has functioned not only as a research institution, but also as an incubator from which presidential administrations select foreign policy personnel. Under the new US presidential administration, at least 16 CNAS alumni have been selected for foreign policy positions.<sup>1</sup>

It is concerning, then, that the Center has exhibited a pattern of behavior in which serious conflicts of interest have gone unacknowledged and undisclosed. CNAS receives large contributions directly from defense contractors, foreign governments, and the US government; publishes research and press material that frequently supports the interests of its sponsors without proper disclosure; and even gives its financial sponsors an official oversight role in helping to shape the organization's research.

This report first examines CNAS's major corporate and government donors, along with several mechanisms through which these donors likely exert influence on the think tank's research agenda. Next, five case studies are presented in which CNAS has promoted the interests of its donors without proper disclosure: 1) supporting the US military's use of private military contractors who donated to CNAS, 2) advocating for the preferred Afghanistan strategy of active-duty US military officials with close links to the Center, 3) making a deal with the UAE embassy for research calling for looser military drone export rules to the country, 4) advocating for additional purchases of jets produced by one of CNAS' largest contributors, and 5) recommending policies on US-China relations which would benefit multiple CNAS donors. Finally, this report reviews CNAS figures in the Biden administration.

Business leaders and policy experts both possess a demonstrably outsized influence on US foreign policy-making,<sup>2</sup> so financial relationships connecting these two parties are potentially quite problematic, especially when the policy experts later move on to public office through the "revolving door." When the business community has such strong influence over a research institution, and that research institution plays a powerful role in staffing the government, it follows that the business community may have influence over government policymaking.

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<sup>1</sup> See Table 2.

<sup>2</sup> Jacobs and Page (2005).

CNAS is far from alone among Washington think tanks engaging in questionable ethical behavior of the variety described in this report, and all such behavior merits greater scrutiny.<sup>3</sup> But the scale and scope of conflicts of interest which appear in CNAS’s work further highlights serious concerns about political corruption as the US completes a historically troubled transition from an administration rife with conflicts of interest, and as President Biden brings in new staff to run the foreign policy and national security agendas of the world’s most powerful country.

## *History and Background*

The Center for a New American Security has had deep Washington ties from the beginning. Both cofounders, Michèle Flournoy and Kurt Campbell, served in Bill Clinton’s Defense Department, among other government roles. The organization’s official launch event in 2007 featured remarks by former secretary of state Madeline Albright and keynote speeches by senators Hillary Clinton (D-NY) and Chuck Hagel (R-NE), president Obama’s future secretaries of state and defense, respectively.<sup>4</sup>

CNAS portrayed itself as a prestigious new research institution that sought to turn away from the foreign policy of the George W. Bush administration while still supporting a “strong, pragmatic, and principled” approach to foreign policy. In one of their first publications, released the same day as the launch event, Flournoy and Campbell state:

The next president will have to convince the American people and their representatives in Congress to reject the neo-isolationist impulses they may feel in the wake of Iraq in order to embrace a smarter and more selective form of engagement. Our nation’s history and power—economic, military, and cultural—give the United States a unique role in the world. The United States has been and will continue to be the preeminent leader in the international community, and we cannot protect or advance our interests in a globalized world if we do not continue to serve in that role. But with this unique role come great responsibilities.<sup>5</sup>

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<sup>3</sup> See, for example, Williams and Silverstein (2013); Beeton (2014); and Lipton and Williams (2016).

<sup>4</sup> Center for a New American Security (2007).

<sup>5</sup> Campbell and Flournoy (2007).

This and other early reports provide a useful window into the hawkish views that orient much of CNAS's research and analysis. The think tank's first-ever report, also coauthored by Flournoy, argued that "the U.S. has enduring interests" in Iraq and the Middle East, "and these interests will require a significant military presence there for the foreseeable future."<sup>6</sup>

Journalist Nathan Hodge described the Center's overall approach "as a way for centrist Democrats to reclaim a place in the national security debate ahead of the 2008 presidential race."<sup>7</sup> But rumor quickly spread that the organization had ulterior priorities as well. In late 2008, the Wall Street Journal noted that the Center was "rapidly emerging as a top farm team for the incoming Obama administration."<sup>8</sup> By the spring of 2010, at least 14 CNAS staffers had been selected for positions in the Obama Defense and State departments; more came later.<sup>9</sup>

CNAS itself acknowledged from its early days that it received funding directly from major weapons contractors and defense companies. These concerns eventually reached Congress. At the 2009 hearing for CNAS cofounder Kurt Campbell's appointment to the State Department, Senate Foreign Relations chairman Jim Webb (D-VA) asked a series of questions:

The question really revolves around the creation of the Center for a New American Security in '07 being heavily funded by defense contractors in government contracts. And ... former CNAS employees then migrating into the president's administration, and whether there are appropriate firewalls between the formation of that.... The viewpoint here is that it was created just before an election cycle, with these contracts moving into it, and then so many of the principals or employees moving into the administration. Would you care to comment on that?

Campbell's response defended CNAS and downplayed the funding. Going further, he said: "We never talked about weapons systems. We do not talk about defense systems. We instead try to always talk at a very high level, on policy issues associated with national security...." Regarding the political consulting that he and other CNAS officials do on the side, including for CNAS donors, he added: "We've kept a very clear line. Not one of our publications, not one of our public advocacies ever touches on anything that these companies worked on."<sup>10</sup>

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<sup>6</sup> Flournoy and Brimley (2007).

<sup>7</sup> Hodge (2010a).

<sup>8</sup> Dreazen (2008).

<sup>9</sup> Hodge (2010a).

<sup>10</sup> Vote Smart (2009).

Campbell set a “very clear line” for when he believes behavior becomes problematic: taking defense industry money while writing broadly about defense issues poses no issue, while talking about *specific* products produced by donors does. CNAS has a similar policy on their “about” page, stating that they “will not engage in any representational activities or advocacy on behalf of any entities or interests.”<sup>11</sup>

As we will see, what makes the ethical standard set both in Campbell’s testimony and on CNAS’s website so notable is that the think tank would go on to violate it on multiple separate occasions, often without any acknowledgement that they were doing so.

## ***Corporate and Government Money in CNAS’s Donor Portfolio***

Though CNAS describes itself as an “independent, bipartisan, nonprofit organization” that is “committed to the highest standards of organizational, intellectual, and personal integrity,” the list of donors they provide on their website gives much cause for preliminary concern.<sup>12</sup> Think tanks are generally funded through a diverse array of sources, including academia, governments, individual donors, non-profit foundations, private companies, and project-specific grants.<sup>13</sup> However, when a think tank is funded primarily by for-profit and government organizations with interests relevant to their research, concerns emerge about the potential for conflicts of interest which can threaten the impartiality of the research.

Top contributors to the Center for a New American Security include General Atomics Chairman and CEO Neal Blue, the US Department of State, and two separate Pentagon offices.<sup>14</sup> In the last decade, CNAS has received funding from all of the “big five” defense contractors – Boeing, General Dynamics, Lockheed Martin, Northrop Grumman, and Raytheon – along with at least 24 other defense companies. A recent Center for International Policy (CIP) review of defense industry and US government support for 50 major American think tanks found that, from 2014 to 2019, “CNAS ... received more funding from defense contractors than any other think tank analyzed here.”<sup>15</sup>

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<sup>11</sup> CNAS (2021a).

<sup>12</sup> Op. Cit.

<sup>13</sup> The Revolving Door Project and its fiscal sponsor, the Center for Economic and Policy Research, do not receive funding from corporate or foreign government sources, and roughly 80% of funding is from foundation grants. For more, see CEPR (2021).

<sup>14</sup> CNAS (2021b).

<sup>15</sup> Freeman (2020). CNAS’s past and present donors in the defense industry include Airbus, BAE Systems, Boeing, Booz Allen Hamilton, CACI, Cubic, DynCorp, Elbit Systems, General Dynamics, GE, Hensoldt, Huntington Ingalls, Itochu,

Their ties with Northrop Grumman are particularly close. According to CIP’s study, over half of Northrop’s total contributions in the sample “went to just one think tank: CNAS.” The defense giant has been listed among CNAS’s top tier of donors for at least five consecutive years.<sup>16</sup>

Alongside contributions from the Departments of Defense and State, US government funding has also come from the Office of the Director of National Intelligence and the National Intelligence Council. Additionally, NATO and at least 11 foreign governments allied with the US have made contributions since 2015: Canada, Finland, Germany, Japan, Latvia, Lithuania, Norway, South Korea, Switzerland, Taiwan, and the United Arab Emirates (UAE). Other supporters of CNAS include fossil fuel companies like BP and Chevron, investment banks like Bank of America and JPMorgan Chase, and technology firms like Facebook, Google, and Microsoft. Overall, 18 of the 100 largest publicly traded corporations in the US each contributed to CNAS in the last fiscal year alone.<sup>17</sup>

Such a breadth of sponsors raises concerns about the feasibility of impartial analysis. Though the mere existence of a conflict of interest does not prove corruption, it creates *opportunities* for corruption that most organizations seek to minimize via internal accountability mechanisms or the use of disclosures when relevant. CNAS goes further than many others in listing its major donors online. But while stating in tax filings that they have a conflict of interest policy,<sup>18</sup> the case studies reviewed in this report suggest that said policy fails to require authors to disclose straightforward institutional conflicts of interests on publications where such disclosures would be highly relevant.

Most CNAS reports appear with some variation of a statement from the organization’s “about” page: “CNAS does not take institutional positions on policy issues and the content of CNAS publications reflects the views of their authors alone.”<sup>19</sup> Several reports also include some variation of the disclaimer that “the authors are solely responsible for any errors in fact, analysis, or omission.”<sup>20</sup> These inclusions give the Center ways to redirect potential concerns

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L3/Harris, Leidos, Leonardo, Lockheed Martin, Northrop Grumman, Raytheon Technologies, Rheinmetall, Rolls-Royce, Saab AB, Safran, SAIC, and Textron. Hodge (2010a) adds Aegis Defense Services and KBR to the list, while Shorrock (2016) adds Mission Essential Personnel and ManTech International, thus bringing the total to at least 29 companies.

<sup>16</sup> CNAS (2021b). Annualized lists of CNAS donors going back to the 2015-16 fiscal year can be accessed via the Internet Archive’s Wayback Machine: [https://web.archive.org/web/2020\\*/https://www.cnas.org/support-cnas/cnas-supporters](https://web.archive.org/web/2020*/https://www.cnas.org/support-cnas/cnas-supporters)

<sup>17</sup> Op. Cit. and Fortune (2020). The 18 are: Alphabet [Google], Amazon, Bank of America, Boeing, Chevron, Cisco, Citigroup, Comcast, ExxonMobil, Facebook, IBM, JP Morgan Chase, Lockheed Martin, Microsoft, Northrop Grumman, Prudential Financial, Raytheon Technologies, and UPS.

<sup>18</sup> CNAS (2020a).

<sup>19</sup> CNAS (2021a).

<sup>20</sup> For a recent example, see page 6 of Cordell and Lee (2021).

about individual reports toward the authors, thus skirting questions of institutional responsibility. Flournoy herself has acknowledged this when discussing practices for conflict of interest avoidance: “... at a place like CNAS, it’s a little easier, in that we don’t take institutional positions: our scholars have their own views, and as you’ve seen, we often debate each other.”<sup>21</sup>

Perhaps more disturbing still are the aspects of CNAS’s organizational structure that offer donors what appears to be a direct role in shaping their research. The “CNAS Corporate Partnership Program” provides tiers of benefits to corporate donors at different contribution levels. Promotional materials tempt sponsors with the opportunity to “... shape strategic policy conversations.” Benefits for contributors over \$30,000 include access to embargoed CNAS reports, the ability to recommend candidates for the Center’s Next Generation National Security Fellowship, and a variety of private meetings, briefings, and events with think tank officials. The top level, for those contributing at least \$120,000, includes an “[i]nvitation to participate in exclusive activities for members of our Board of Advisors with national security principals and CNAS experts.”<sup>22</sup>

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<sup>21</sup> The Fletcher School (2014). These remarks begin at 00:37:43. This transcription is lightly edited for clarity.

<sup>22</sup> CNAS (2021c).

## *Donor Involvement in CNAS's Board of Advisors*

While CNAS's board of directors is in charge of the organization, there is also a board of advisors that "actively contributes to the development of the Center's research and expands [their] community of interest," with members who "engage regularly with the intellectual power generated at CNAS, though they do not have official governance or fiduciary oversight responsibilities."<sup>23</sup>

More than 70 percent of the seats on this board — at least 27 of the 38— belong to individuals who work at one of CNAS's major financial sponsors, represent multiple CNAS donors, and/or are themselves large individual donors. Together, these board members and the organizations they directly represent contributed between \$1.6 million to \$3.7 million to CNAS in the most recent fiscal year (between roughly 12 and 28 percent of their total revenue).<sup>24</sup>

Rather than serving as an impartial group of "prominent leaders," their board of advisors gives many of those financing the think tank a significant role within the organization itself. **Table 1** lists these 27 advisory board members, their donations, and their current ties to relevant industries; several board members contributing less than \$5,000 were not included.

Neal Blue, the billionaire executive of General Atomics and top personal contributor to CNAS, holds a position on the Center's Board of Advisors. Other board members include three CEOs of defense companies who have contributed to CNAS: Huntington Ingalls, Leidos, and Leonardo DRS. They join Arnold Punaro, chairman of the National Defense Industrial Association, an industry trade group whose mission is to engage "... thoughtful and innovative leaders to promote the best policies, practices, products, and technology for warfighters..."<sup>25</sup> Other seats belong to executives from the Aerospace Industries Association, Bank of America, McKinsey & Co., Microsoft, Raytheon, and more.

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<sup>23</sup> CNAS (2021d). For the list of CNAS's Board of Advisors, see CNAS (2021e).

<sup>24</sup> CNAS (2021e), CNAS (2020a), and authors' calculations.

<sup>25</sup> NDIA (2021a) and NDIA (2021b).

**Table 1**

**Members of the CNAS Board of Advisors and their Connections to CNAS' Donor Portfolio**

Board Member	Donor Type	Overlap with Donor Organizations	2019-20 Contribution Level
Arnold Punaro	Individual & Indirect	Board Chairman, National Defense Industrial Association (NDIA)*	\$10,000 – 24,999 & NDIA members are contributors
Carol Deane	Individual		\$100,000 – 249,999
Carol Eggert	Corporate	Senior VP of Military and Veteran Affairs, Comcast NBCUniversal	\$100,000 – 249,999
Christopher Heinz	Foundation	Director of Board of Advisors, Heinz Endowment, Heinz Family Foundation	\$50,000 – 99,999
Dale L. Ponikvar	Individual		\$25,000 – 49,999
Eric Fanning	Indirect	President and CEO, Aerospace Industries Association (AIA)*	AIA members are contributors
Frederick O. Terrell	Individual		\$10,000 – 24,999
Frederick S. Humphries, Jr.	Corporate	Corporate VP of U.S. Government Affairs, Microsoft	\$100,000 – 249,999
H. Perry Boyle	Individual		\$25,000 – 49,999
Heather Nauert	Corporate	Advisory Board Member, BGR Group	\$25,000 – 49,999
James M. Beamesderfer	Corporate	VP, Veterans Initiatives, Prudential Financial	\$100,000 – 249,999
Jeremy Achin	Corporate	CEO and Cofounder, DataRobot	\$100,000 – 249,999
Joe Reeder	Individual		\$5,000 – 9,999
Lawrence Di Rita	Corporate	Market President for Greater Washington DC, Bank of America	\$100,000 – 249,999
Mark Chandler	Corporate	Executive VP, CLO, and CCO, Cisco Systems	\$100,000 – 249,999
Michael Beckley	Individual		\$25,000 – 49,999
Mike Petters	Individual & Corporate	President and CEO, Huntington Ingalls Industries	\$10,000 – 24,999 ind. & \$100,000 – 249,999 corp.
Neal Blue	Individual	Chairman and CEO, General Atomics	\$250,000 – 499,999
Raj Shah	Individual		\$10,000 – 24,999
Rebecca Liao	Individual		\$10,000 – 24,999
Roger Krone	Corporate	Chairman and CEO, Leidos	\$100,000 – 249,999
Timothy J. McBride	Corporate	Head of Global Government Relations, Raytheon Technologies	\$50,000 – 99,999
Thomas Schick	Individual		\$5,000 – 9,999
Todd Zabelle	Individual & Corporate	Founder and CEO, Strategic Project Solutions	\$25,000 – 49,999 ind. & \$25,000 – 49,999 corp.
Varun Marya	Individual & Corporate	Senior Partner, McKinsey & Company	<\$4,999 ind. & \$25,000 – 49,999 corp.
Walter F. Parkes	Individual		\$25,000 – 49,999
William J. Lynn III	Individual & Corporate	CEO, Leonardo DRS and Leonardo North America	<\$4,999 ind. & \$100,000 – 249,999 corp.

**Sources and Notes:** CNAS (2021b) and CNAS (2021e). Three more advisory board members had individual contributions <\$4,999, while a possible fourth, “Jim” Thomas, could not be verified as the donor “James” Thomas.

\*: NDIA and AIA are both membership-based defense industry trade groups.

# *A Very Unclear Line: Case Studies of Conflicts of Interest at CNAS*

The Center's unique funding portfolio and internal structure may help to provide some insight into the various ethical concerns raised around its work since its early years. What follows are five case studies where significant undisclosed conflicts of interest have arisen.

## *Private Military Contractors on the Battlefield*

No more than six months after Kurt Campbell's defense of CNAS in which he drew a "very clear line" that "[n]ot one of our publications ... ever touches on anything that [our donors] worked on,"<sup>26</sup> the organization released a publication touching on something which some of their donors worked on. In December 2009, coauthors John A. Nagl and Richard Fontaine published a report on the controversial role of private military contractors operating on behalf of the US in war zones, a role that had expanded dramatically during the War on Terror.

"Contractors have become an enduring feature of modern American conflicts, and the United States cannot now engage in hostilities or in reconstruction and stabilization operations without them," the report states. Though the contracting industry may be "plagued by its own set of problems," Nagl and Fontaine argue reforms can improve performance; regardless, "contractors in American conflicts are here to stay." They add: "not a single mission in Iraq or Afghanistan has failed because of contractor non-performance," a claim which is correct only in a purely technical sense.<sup>27</sup>

Several months later, it was reported that CNAS had received funding from Aegis Defence Services, DynCorp, KBR, and other military contractors who provided the types of services praised in CNAS's paper.<sup>28</sup> This funding is not disclosed anywhere in the full report. Later reporting revealed that CNAS also accepted funding from additional private military contractors such as Mission Essential Personnel and SAIC, though these contributions may have come after the paper's publication.<sup>29</sup> Many of these companies had a direct financial

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<sup>26</sup> Vote Smart (2009).

<sup>27</sup> Nagl and Fontaine (2009). As they acknowledge, private military contractors have not been criticized primarily for acute failures in specific operations, but for more systemic issues of accountability, political legitimacy, cost-efficiency, etc. that contribute to a failure in achieving long-term strategic priorities. See Singer (2003).

<sup>28</sup> Hodge (2010a).

<sup>29</sup> Shorrock (2016).

stake in the subject of CNAS's report. DynCorp, for example, ultimately received \$2.8 billion in State Department funding for its Afghanistan operations from 2002 to 2013, or 69 percent of the State Department's total such funding over this period.<sup>30</sup>

John A. Nagl — coauthor of the report, former CNAS president, and current advisory board member — commented: “The people we talk to, our corporate funders, are involved in that business.... We talk to them about the fact that we're doing that project. We talk to them about their perspectives on it — but they don't directly fund that work.”<sup>31</sup> This suggests that contributions to the Center's general fund are not considered sufficient grounds for a disclosure, contradicting Flournoy's later claim that CNAS's tendency toward the “pooling of funding” is a force that actually “washes out” some concerns of “bias.”<sup>32</sup> The report's other coauthor, Richard Fontaine, is currently CNAS's CEO.<sup>33</sup>

## ***Ties to the US Military in Afghanistan***

The Center has close ties to current and former US military officials, even beyond their Pentagon funding. When former Pentagon spokesperson David Romley was announced as CNAS's senior VP in 2015, he was praised by retired Gen. James Mattis, whom the think tank described as “a member of [the] CNAS Board of Directors and Romley's former Commanding General.”<sup>34</sup> In fact, Romley had been the “senior Marine spokesman” for Gen. Mattis himself.<sup>35</sup> Mattis has since served as defense secretary under Trump, while Romley's work elsewhere has implicated him as a participant in a disinformation campaign commissioned by the former de facto Bolivian government to support the 2019 coup which put them in power.<sup>36</sup>

CNAS's work on the war in Afghanistan helped revealed how far the Center would go to promote the ideas shared by military officials whom they have close ties to. They served as an intellectual hub for “counterinsurgency” theory in the context of the US' ongoing wars, and in 2010 they effectively circumvented the military's chain of command by publishing a public critique of US strategy in Afghanistan by then-active duty Gen. Michael Flynn (Trump's future national security advisor). Nagl defended the move at the time, but admitted: “Obviously, it was

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<sup>30</sup> Special Inspector General for Afghanistan Reconstruction (2014).

<sup>31</sup> Hodge (2010a).

<sup>32</sup> The Fletcher School (2014). These remarks begin at 00:38:08. This transcription is lightly edited for clarity

<sup>33</sup> CNAS (2021i).

<sup>34</sup> CNAS (2015).

<sup>35</sup> Romley (2021). Though absent from the press release, this may have featured on his now-deleted CNAS staff profile.

<sup>36</sup> Heinz (2020).

an irregular way to disseminate an idea for a serving officer.”<sup>37</sup> The report helped Flynn advance his controversial career, an act which the Center’s Thomas E. Ricks has since apologized for, acknowledging the “new prominence in the world of intelligence” it gave him.<sup>38</sup>

While a CNAS fellow, former US Army officer Andrew Exum was invited by Gen. Stanley McChrystal, formerly his immediate boss, to be one of several experts participating in a 2009 “strategic assessment” of US Afghanistan strategy.<sup>39</sup> Gen. McChrystal wanted to revise the military’s approach, and knew that “upon returning from their Pentagon-organized visit to Afghanistan, many of the participants in the strategic assessment would serve as an advance guard for [his] upcoming request for a significant increase in troops and resources.”<sup>40</sup>

As documented by George Mason University’s Janine Wedel, Exum obliged.<sup>41</sup> In an October 2009 PBS interview, Exum praised McChrystal as one of the US’s “best and brightest commanders” without disclosing their personal relationship.<sup>42</sup> The same month, he released a CNAS policy brief describing the “best case scenario for Afghanistan” as one that “requires a considerable investment of resources, though perhaps fewer than imagined,” including additional troop deployments.<sup>43</sup> Exum mentions McChrystal’s strategic assessment, but discloses neither his participation in it nor his time as a civilian advisor to McChrystal.

It was a September 2009 Washington Post book review that ultimately sparked controversy. Exum wrote that a book by Jon Krakauer (*Where Men Win Glory: The Odyssey of Pat Tillman*, which included serious criticism of McChrystal) “falls flat,” largely because Krakauer was too “eager to launch an inquisition into the crimes of the Bush administration....”<sup>44</sup> In a CNAS blog post, Exum doubled down: “Stan McChrystal is one of the finest men I have ever known, and I hope I have sons who serve under men like him. Jon Krakauer is going after him now because he has written a crappy book and now has to sell it.”<sup>45</sup>

In November, the Post’s ombudsman published an article announcing that their “contract with reviewers requires them to disclose even the ‘possibility’ of ‘an appearance of a conflict of

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<sup>37</sup> Hodge (2010b). For the report, see Pottinger, Flynn, and Batchelor (2010).

<sup>38</sup> Hodge (2010a) and Ricks (2016).

<sup>39</sup> Conan (2010) and Brand (2011).

<sup>40</sup> Hodge (2010a).

<sup>41</sup> Wedel (2016).

<sup>42</sup> Exum (2009a).

<sup>43</sup> Exum (2009b).

<sup>44</sup> Exum (2009c).

<sup>45</sup> Exum (2009d). Exum ran a blog on CNAS’s website under the pseudonym of “Abu Muqawama.” Exum (2013). Since then, an update of the CNAS website has caused Exum’s posts to appear without an author line, though his authorship is made clear by references to Exum’s work in the first person.

interest,” and that this “no-conflict clause was violated” by Exum’s failure to disclose his participation in Gen. McChrystal’s assessment.<sup>46</sup> Unlike Exum’s CNAS paper, the book review now appears with a correction disclosing the conflict of interest. Nonetheless, the larger media campaign around McChrystal helped turn President Obama away from his initial skepticism and to ultimately embrace McChrystal’s request for a “surge” in Afghanistan.<sup>47</sup> Exum later served as deputy assistant secretary of defense for Middle Eastern policy from 2015 to 2016.<sup>48</sup>

## ***Drone Exports to the United Arab Emirates***

In June 2017, media outlets were sent leaked emails from an account belonging to Yousef al-Otaiba, UAE ambassador to the US. Among the documents was an invoice from July 2016 in which CNAS billed the Emirati embassy \$250,000 for a “UAE Missile Technology Control Regime (MTCR) Study.”<sup>49</sup> The embassy of the Persian Gulf monarchy, which at that time was involved in a brutal war and accompanying humanitarian disaster in Yemen,<sup>50</sup> paid CNAS to produce a private paper which Otaiba could use to advocate for looser rules surrounding the export of US military-grade drones.

Otaiba received the report, circulated it among UAE military officials, and wrote back: “...thank you for the report. I think it will help push the debate in the right direction. Some of the UAV [unmanned aerial vehicle] manufacturers are pushing for a similar conclusion, so this report might reaffirm their arguments.”<sup>51</sup>

A month after Otaiba’s email, CNAS published a paper on drone proliferation which argued that “[t]he Trump administration should loosen restrictions on drone exports,” and “consider targeted exports of uninhabited aircraft, including armed uninhabited aircraft, to close partners and allies provided that they agree to the principles for proper use.”<sup>52</sup> The paper makes no mention of the Center’s deal with the UAE. A CNAS spokesperson admitted that the research done for Otaiba’s paper had “supported an already ongoing CNAS project on drone proliferation policy,” but insisted that both papers adhered to their “intellectual independence” policies.<sup>53</sup>

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<sup>46</sup> Alexander (2009).

<sup>47</sup> Baker (2009).

<sup>48</sup> US Department of Defense (2015).

<sup>49</sup> Jilani and Emmons (2017).

<sup>50</sup> Stewart (2016), Human Rights Watch (2018) and Lederer (2020).

<sup>51</sup> Jilani and Emmons (2017).

<sup>52</sup> Ewers, Fish, Horowitz, et. al. (2017).

<sup>53</sup> Jilani and Emmons (2017).

The UAE first purchased unarmed drones in 2013 in a nearly \$200 million deal with General Atomics – the company led by Neal Blue, a major CNAS donor and advisory board member.<sup>54</sup> The drones were delivered in 2017, the same year as CNAS’s report urging the US government to let the UAE import armed drones. In response to US export restrictions, the UAE (traditionally a US ally) also purchased armed drones from China. The Royal United Services Institute, a British think tank, observed that “[a]t least part of the reasoning behind the UAE’s recent purchases of armed UAVs from China appears, besides prestige, to be to convince the US to sell armed versions of its iconic MQ-9 Reaper and MQ-1 Predator UAVs...”<sup>55</sup> CNAS’s report mentions the acquisitions of Chinese drones by the UAE and others four separate times.

Before withdrawing from the conflict in 2019, the UAE put its Chinese-made drones to use in Yemen, including to assassinate a Houthi political leader involved in talks toward ending the conflict just days before he was set to meet with the UN special envoy to Yemen.<sup>56</sup> Shortly after Election Day last year, the Trump administration nonetheless announced it planned to go forward with a \$2.9 billion sale of military drones to the UAE.<sup>57</sup> Attempts to stop the sale over humanitarian and security concerns failed in a 46-50 Senate vote, though it may now be on hold due to the Biden administration’s freeze on Saudi and Emirati weapons sales.<sup>58</sup>

## ***Air Force Purchases of the B-21 Raider***

In 2018, CNAS released a report by Jerry Hendrix, former senior fellow and director of the Center’s Defense Strategies and Assessments Program, which called the B-21 Raider stealth bomber “the next evolution in penetrating strike aircraft...” While the US Air Force currently plans to purchase 100 of these jets, Hendrix argued that “these investments do not go far enough,” and suggested that the military could benefit from “adding another 50 to 75 aircraft to the planned buy,” along with other new purchases of military weaponry.<sup>59</sup>

Nowhere in the report is it disclosed that the maker of the B-21 bomber, Northrop Grumman, was one of CNAS’s top donors at the time the report was produced; in fact, the *majority* of the company’s think tank contributions in the late 2010’s went to CNAS.<sup>60</sup> In the nearly four months since this conflict of interest was first publicly identified, no disclosure has been

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<sup>54</sup> Reuters (2013).

<sup>55</sup> Tabrizi and Bronk (2018).

<sup>56</sup> Walsh and Kirkpatrick (2019) and Shaif (2018).

<sup>57</sup> Stone and Zengerle (2020).

<sup>58</sup> Edmondson (2020) and Strobel (2021).

<sup>59</sup> Hendrix (2018).

<sup>60</sup> CNAS (2019), Freeman (2020), and Northrop Grumman (2021).

added.<sup>61</sup> This constitutes a transparent contradiction of Campbell’s earlier testimony that CNAS researchers “do not talk about defense systems” made by donors. Nor is this a lone instance: Hendrix published a nondisclosed article the year before stating that Northrop Grumman’s withdrawal from the competition for a Navy contract “represent[s] fears that the situation within U.S. Navy acquisitions is far from healthy.”<sup>62</sup>

In 2019, the Air Force projected that the per-unit cost of a B-21 will be about \$656 million.<sup>63</sup> If the Air Force were to adopt CNAS’s recommendation to add another 50 to 75 jets to its purchase, it would mean something in the range of an additional \$32.8–\$49.2 billion in sales for one of their largest donors. While CNAS scholars are far from the only participants in the debate over B-21 procurement, taking a simplified look at Northrop Grumman’s \$2.36 million in donations to CNAS (2014–2019)<sup>64</sup> as an investment in 50 potential new B-21 sales would suggest a return on investment of roughly 1,390,000 percent. If CNAS’s report plays even a *miniscule* role in convincing the Air Force to *slightly* expand B-21 acquisitions, Northrop Grumman will successfully profit from its recent contributions to the organization through the sales of a single plane.

## *China and the Pacific*

CNAS dedicates significant attention toward highlighting the perceived threat that China poses to the United States. One report published last year, “Rising to the China Challenge,” was cowritten by a large group of authors including Daleep Singh, Elizabeth Rosenberg, Ely Ratner, Peter Harrell, and Susanna Blume, all of whom now serve in the Biden administration.<sup>65</sup>

The report puts forward a list of recommendations calling for the US to plan for “China contingencies,” to “ensure the Department of Defense can develop, access, and leverage the latest technologies,” and to “[s]ustain and enhance a traditional and nontraditional defense industrial base that is robust, flexible, and resilient.”<sup>66</sup> The nearly 30 defense contractors who have contributed to CNAS in recent years would stand to profit heavily from these proposals. This dilemma further underlines why CNAS’s funding structure calls its independence into question: the corollary of any major realignment of US foreign policy in the direction of

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<sup>61</sup> Hendrix (2018) and Freeman (2020).

<sup>62</sup> Hendrix (2017).

<sup>63</sup> Gady (2019).

<sup>64</sup> Freeman (2020).

<sup>65</sup> Ratner, Kliman, Blume, et. al. (2020) and Korman (2021).

<sup>66</sup> Ratner, Kliman, Blume, et. al. (2020).

militaristic confrontation is an expansion in demand for the services of the defense industry, the think tank's primary patrons.

More directly, the report urges the United States to “strengthen diplomatic and security ties with Taiwan” while failing to disclose that the Taipei Economic and Cultural Representative Office (TECRO), effectively Taiwan’s embassy in the US, is a major donor to the think tank. CNAS is not alone in this particular conflict of interest: TECRO’s funding of DC think tanks has been described as “omnipresent and rarely disclosed” in discussions of US-Pacific relations.<sup>67</sup> In this particular case, the authors argued that “the United States will need to find ways to effectively defend Taiwan, the Philippines, and Japan from growing Chinese military power.”<sup>68</sup> In the fiscal year that CNAS made this statement, TECRO and the Japanese Embassy each contributed between \$100,000 and \$249,999 to their budget.<sup>69</sup>

Report co-author Ely Ratner, now a special assistant to the secretary of defense, has recently been selected to lead the Pentagon’s “China Task Force,” which aims to “provide a baseline assessment of department policies, programs and processes in regard to the challenge China poses.”<sup>70</sup>

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<sup>67</sup> Clifton (2020).

<sup>68</sup> Ratner, Kliman, Blume, et. al. (2020).

<sup>69</sup> CNAS (2021b).

<sup>70</sup> Garamone (2021).

# CNAS Alumni and the Biden Administration

Flournoy has remarked on one way in which CNAS stands out from other think tanks:

At CNAS, we actually made growing the next generation of national security leaders an explicit part of our mission. And we take a somewhat different approach to staffing by design ... we want to be staffed primarily by ‘futures,’ 30- or 40-something experts who are hungry, entrepreneurial, [and] making a name for themselves. And we put that emphasis on launching them through professional development, mentoring, etc., into careers in public service.<sup>71</sup>

Recognizing that “think tanks are a part of this revolving door phenomenon in Washington” for older officials *leaving* government, she emphasized the importance of hiring younger experts to *enter* government and influence future policy. The same year as Flournoy’s address, political scientist Donald E. Abelson referred to institutions in this vein as “holding tanks,” think tanks “where policy experts congregate in the hope of being recruited into senior government positions.”<sup>72</sup> This institutional priority has become apparent again as a growing number of CNAS officials are now serving in the Biden administration.

**Table 2** lists the at least 16 CNAS alumni who have been selected for foreign policy and national security policy-making positions in the Biden administration so far. Flournoy herself was widely expected to serve as Biden’s defense secretary,<sup>73</sup> but was ultimately passed over last December. A January 8, 2021 CNAS press release announced the selection of Andrea Kendall-Taylor, senior fellow and director of the Center’s Transatlantic Security Program, for a position on the National Security Council (NSC), but in a February 2 tweet she declared her intention to stay at the think tank without further explanation.<sup>74</sup>

Many of these figures previously served as volunteers on Biden’s agency review teams, which were responsible for managing the transition at federal agencies (thus giving them power over the selection of nominees).<sup>75</sup> Several of the CNAS alumni who served on these teams have not yet had a position in the Biden administration announced, such as Sharon Burke on the defense department review team, Alexandra Kahan on the state department team, and Matt

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<sup>71</sup> The Fletcher School (2014). These remarks begin at 00:21:08. This transcription is lightly edited for clarity.

<sup>72</sup> Abelson (2014).

<sup>73</sup> See, for example, Kheel and Mitchell (2020).

<sup>74</sup> Estep (2021a) and Kendall-Taylor (2021).

<sup>75</sup> Buildbackbetter.gov (2021) and Thompson, Meyer, and Cassella (2020).

Olsen on the intelligence community team. Several CNAS alumni joining the administration have individual records of concerning ethical conduct.

*Table 2*

**CNAS Alumni in the Biden Administration**

<b>Name</b>	<b>CNAS Role</b>	<b>Biden Administration Role</b>
Alice Friend	Former Adjunct Senior Fellow	Deputy Chief of Staff to the Deputy Secretary of Defense
Avril Haines	Former Board of Directors Member	Director of National Intelligence
Colin Kahl	Former Senior Fellow	Under Secretary for Defense
Daleep Singh	Former Adjunct Senior Fellow	Deputy National Security Advisor
David Cohen	Former Adjunct Senior Fellow	Deputy Director of the CIA
Derek Chollet	Former Senior Fellow	Counselor of the Department of State
Desirée Cormier Smith	Former Next Generation National Security Fellow	Senior Advisor at the State Department
Elizabeth Rosenberg	Director of CNAS’s Energy, Economics, and Security Program	Counselor to the Deputy Secretary of the Treasury
Ely Ratner	Executive Vice President and Director of Studies	Special Assistant to the Secretary of Defense
Hady Amr	Former Adjunct Senior Fellow	Deputy Assistant to the Secretary of State for Israeli-Palestinian Affairs
Kayla Williams	Director of CNAS’s Military, Veterans, and Society Program	Assistant Secretary of Veterans Affairs for Public Intergovernmental Affairs
Kurt Campbell	Cofounder and Board of Directors Chairman	Deputy Assistant to the President; and Coordinator for Indo-Pacific Affairs, NSC
Mira Rapp-Hooper	Former Adjunct Senior Fellow	Senior Advisor on China at the State Department’s Policy Planning Staff
Peter Harrell	Former Adjunct Senior Fellow	Senior Director for International Economics and Competitiveness, NSC
Susanna Blume	Director of CNAS’s Defense Program	Senior Advisor to the Secretary of Defense
Victoria Nuland	Former CEO	Under Secretary of State for Political Affairs

**Sources and Notes:** Bender and Meyer (2020), Cormier Smith (2021), CNAS (2021f), CNAS (2021g), CNAS (2021h), CNAS (2021j), CNAS (2021k), CNAS (2021l), Eidelson (2021), Estep (2021a), Estep (2021b), Korman (2021), Ravid (2021), US Department of Defense (2021), and Wertime (2021). This count does not include Susan Rice, a former member of CNAS’s Board of Advisors who will be serving in a domestic policy-making position in the Biden White House. Dreazen (2008) and Pager (2020). This table was updated on February 12, 2021, to include additional CNAS alumni.

## ***Kurt Campbell***

Kurt Campbell, CNAS cofounder and the most recent chair of its board of directors, has been announced as the Biden administration’s deputy assistant to the president and coordinator for Indo-Pacific affairs on the NSC.<sup>76</sup> Campbell’s response to congressional questioning during his 2009 appointment to the Obama administration, drawing “a very clear line,” has served as the primary standard of concerning behavior for this report.

During his time in the Obama administration, Campbell helped implement the Obama administration’s reorientation of foreign policy toward the Pacific, often referred to as the “Pivot to Asia.” More recently, Campbell has been the chairman and CEO of The Asia Group, LLC, a consulting firm which among other services “assists and facilitates Asian firms seeking entry and introductions into the United States,” helping clients with “high level political and business introductions in target markets...”<sup>77</sup>

Campbell served concurrently as the chairman for CNAS, which seeks to *inform* decision-makers on US policy in Asia, and for The Asia Group, which seeks to *persuade* decision-makers on US policy in Asia. This arrangement has led him to contradict his 2009 congressional testimony. In 2017, Campbell personally attended an event which The Asia Group set up to introduce Vietnam’s prime minister to “nearly 20 top American tycoons” the day before the PM first met with President Trump; the two leaders discussed “trade and North Korea.”<sup>78</sup> A month earlier, a report from Campbell’s CNAS included recommendations to the Trump administration to pursue bilateral trade agreements and expand military support for a number of Southeast Asian nations – including Vietnam.<sup>79</sup>

## ***Avril Haines***

Avril Haines, who was approved as the new director of national intelligence in an 84-10 Senate vote, sat on the think tank’s board of directors and was a former principal at Flournoy’s consulting firm WestExec, which has represented a number of major corporate clients who donate to CNAS.<sup>80</sup> Recent personal financial disclosures show that she reported \$180,000 in

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<sup>76</sup> Estep (2021b).

<sup>77</sup> CNAS (2020c). An archived copy of the webpage has been used, as most information on Campbell was recently deleted.

<sup>78</sup> Tuan (2017) and Elliott (2018).

<sup>79</sup> Cronin and Cho (2017).

<sup>80</sup> CNAS (2021b), CNAS (2021f), Bender and Meyer (2020), Thompson and Meyer (2021), and US Senate (2021).

“consulting fees” from Palantir, which is also a CNAS donor.<sup>81</sup> Founded by far-right billionaire Peter Thiel, Palantir is a data-mining company and major contractor for Immigration and Customs Enforcement, and the company’s software helped facilitate the Trump administration’s mass deportations of immigrants.<sup>82</sup>

Haines previously served in the NSC and the CIA. During the latter period, she refused to discipline CIA employees who spied on US Senate staffers’ emails while they were reviewing the CIA’s torture program, and she reportedly resisted the declassification of the Senate Intelligence Committee’s report on said program.<sup>83</sup>

## ***Victoria Nuland***

Victoria Nuland, former CEO of CNAS, is Biden’s selection for undersecretary of state for political affairs, the department’s third-most powerful position.<sup>84</sup> Nuland is somewhat controversial among European diplomats for her hawkish approach toward US-Russian relations, with one saying: “She doesn’t engage like most diplomats. She comes off as rather ideological.”<sup>85</sup> A leaked call in which Nuland expressed frustration with the European approach towards the Ukraine crisis and commented “fuck the EU” circulated widely.<sup>86</sup> In an article last year (after her departure from CNAS), she called for increased defense spending and weapons development, as well as to “establish permanent bases along NATO’s eastern border.”<sup>87</sup> The governments of two nations on NATO’s eastern border, Latvia and Lithuania, are recent contributors to CNAS.<sup>88</sup>

## ***Other Concerns***

While a comprehensive review of conflicts of interest in the individual careers of all 16 CNAS alumni is outside the scope of this report, issues remain among the other CNAS alumni. As has been noted, Blume, Harrell, Ratner, Rosenberg, and Singh were all among the co-authors of the report “Rising to the China Challenge,” this report’s fifth case study. Furthermore, a brief cursory review was all that was necessary to begin identifying other concerning behavior.

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<sup>81</sup> US Office of Government Ethics (2020) and CNAS (2021b).

<sup>82</sup> Gray and Mac (2020) and Ongweso Jr. (2020).

<sup>83</sup> Ackerman (2020).

<sup>84</sup> Korman (2021).

<sup>85</sup> Hudson (2015).

<sup>86</sup> BBC (2014).

<sup>87</sup> Nuland (2020).

<sup>88</sup> CNAS (2021b).

Derek Chollet, a former CNAS fellow and executive VP of the think tank The German Marshall Fund, will serve as a counselor of the U.S. Department of State in the Biden administration. In 2019, Chollet held a series of press appearances to honor NATO's 70th anniversary, including a Washington Post opinion piece and congressional testimony in which he told Congress: "Continued support for funding of the U.S. military efforts in Europe will remain essential."<sup>89</sup> He also teamed up with CNAS CEO Richard Fontaine for a public program at the Truman Library, and the two coauthored a column in The Kansas City Star to promote the event the day before.<sup>90</sup>

At no time in any of these appearances did either party openly disclose the fact that both of their organizations received funding from NATO. CNAS received somewhere between \$25,000 and \$50,000 from NATO's Allied Command Transformation HQ in 2018, the year prior to the event, while the German Marshall Fund received between \$250,000 and \$500,000 from NATO in both 2017 and 2018.<sup>91</sup>

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<sup>89</sup> Chollet (2019a) and Chollet (2019b).

<sup>90</sup> Truman Library Institute (2019) and Chollet and Fontaine (2019).

<sup>91</sup> Freeman (2020). Data confirmed via an email request to Ben Freeman, Director of CIP's Foreign Influence Transparency Initiative, 11 January 2021.

## *Conclusion and Recommendations*

In 2014, CNAS cofounder Michèle Flournoy spoke at a conference where she provided frank commentary on the American think tank industry. “The funding climate has changed for think tanks,” she notes. “Since the Great Recession of 2008, I think think tanks have been operating in a much more financially austere environment ... consequently, many, though not all, think tanks have turned more and more to corporations and the business community for their support, and also to foreign sources of funding.”<sup>92</sup>

Flournoy spent significant time discussing concerns by some about “whether there is inherent bias in the sources of one’s funding ... within the think tank community, and certainly within CNAS, it’s raised this debate of ‘are we doing enough?’ to ensure that there isn’t undue bias introduced by any source of funding, foreign or otherwise.”<sup>93</sup> She continues:

Every funder has intent. They’re giving you money for a reason. And what you have to ensure in running a think tank is that that bias does not creep into your analysis or constrain your analysis ... Even when best practices are followed, you have to ask at the end of the day, will the work be *perceived* as biased, or pulling punches, given the source of the funding? ... I think this is a very serious set of issues that think tanks have to think through to maintain their independence and their integrity.

I think that the next chapter in this discussion is going to be about corporate donors ... There are some organizations that call themselves “think tanks” that actually accept money from corporations to do very specific work that tends to advocate the programs those companies produce, and I think that sort of ... makes the waters more murky, and it also raises the bar for everybody else who’s serious about independence to ensure that that’s not happening more broadly.<sup>94</sup>

The authors of this report are in full agreement with Michèle Flournoy’s expressed concerns about the biases produced by corporate and government financing of think tanks, and it is for this reason that we have highlighted her organization’s failure in “doing enough” to prevent “undue bias.”

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<sup>92</sup> The Fletcher School (2014). These remarks begin at 00:15:00. This transcription is lightly edited for clarity.

<sup>93</sup> Op. Cit. These remarks begin at 00:35:15. This transcription is lightly edited for clarity.

<sup>94</sup> Op. Cit. These remarks begin at 00:38:35. This transcription is lightly edited for clarity.

Over the last 14 years, CNAS has produced a large body of research and established connections with a wide variety of scholars and DC power players. Despite these accomplishments, a straightforward pattern of nondisclosed conflicts of interest has emerged, stemming in large part from the influences of the Center’s corporate, military, and foreign government donors. A donor portfolio composed of powerful parties with their own policy interests, a “Corporate Partnership Program” with member benefits, and a donor-stacked board of advisors compound one another to create serious ethical questions. Taken together with their tendency to serve as a recruitment center for presidential administrations, the Center’s issues are difficult to avoid.

Several years after his failure-to-disclose incident, former CNAS fellow Andrew Exum indirectly addressed the situation by acknowledging that scholars “have an obligation to announce our conflicts of interest and to let the public make an informed decision about the substance of our research,” pointing to a blog post where he had provided proper disclosure before. He added, though: “It is not enough to establish correlation.... One must also establish causation as well.... You better have hard evidence to support the latter.”<sup>95</sup> Wedel notes that this is an odd standard for an impartial researcher: “unless you have the goods to back up a conflict-of-interest question, you shouldn’t even float it.... good intentions, as perceived by the players themselves, trump everything and should inoculate them from inquiry.”<sup>96</sup>

Furthermore, Exum’s response avoids an important debate going beyond corruption. It isn’t necessary for there to be a quid pro quo between sponsors and researchers in order to successfully distort the public’s worldview in favor of said sponsors. Powerful sponsors can ensure that people already inclined to agree with them are given the largest public platforms, thus ensuring large audiences for those whose sincerely held beliefs align with their interests. Lee Drutman of the think tank New America has estimated that business interests spend 34 times as much on lobbying as unions and public interest groups do, and added:

Large companies also spend considerable resources shaping the intellectual environment through funding think tanks and academic research and symposia—that is, by shaping elite consensus. Spreading ideas is by no means quid pro quo corruption. But in a world where resources to spread ideas are highly unequal, the outcomes of such distortions can feel a bit like corruption.<sup>97</sup>

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<sup>95</sup> Exum (2012).

<sup>96</sup> Wedel (2016).

<sup>97</sup> Drutman (2015).

The Center’s hawkish ideological leanings, which prioritize “Extending American Power,”<sup>98</sup> are naturally favorable to influential sponsors who see opportunities for profit or gain in such an extension. If CNAS is successful in influencing policy makers, they effectively generate new demand for the defense industry and related parties. This, in turn, enriches these sponsors and provides them with additional financial resources with which to fund outlets like CNAS, thus spawning a positive feedback loop of militarism.

Many examples of conflict of interest in this report can be explained as simple lapses in oversight. By way of illustration, some figures associated with CNAS have been publicly supportive of the US government investing in semiconductor technologies, and while it may be true that the Semiconductor Industry Association gave them a five-digit contribution last year, it is also true that there’s reason to view this as a smart recommendation which many objective researchers would make.<sup>99</sup>

But when a pattern emerges, it suggests that the ambiguity is intentional. Wedel argues that “[s]uch impenetrable organization means that it’s almost impossible to put your finger on, ultimately, who is responsible or accountable for what – if anyone is,” thus creating “the perfect environment” for betrayals of the public trust.<sup>100</sup> Campbell, Flournoy, Fontaine, and other senior CNAS officials have called to “significantly increase U.S. national security and defense spending.”<sup>101</sup> While it is unlikely that they made this argument solely because they were paid to do so by defense contractors, it is difficult to distinguish between this possibility and the also-troubling alternative that defense contractors paid them *because* they made it.

This report contains criticism of the activity of more than a dozen current and former CNAS officials. Rather than a collection of individual missteps, the Center’s behavior over more than a decade suggests, at best, a serious deficiency of accountability. At worst, it suggests a systemically corrupt arrangement in which CNAS promotes the interests of its sponsors in work claiming to be purely in the public interest.

Several policy options exist to prevent think tanks from hiding conflicts of interest while presenting themselves as impartial researchers. Congressional “Truth-in-Testimony” rules created by Rep. Jackie Speier (D-CA) in 2014 now require think tank experts who testify on

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<sup>98</sup> Campbell, Edelman, Flournoy, et. al. (2016).

<sup>99</sup> See, for example, the comments of former CNAS adjunct fellow Eric Sayers to the Washington Post in a June 2020 article which was featured on CNAS’s website. CNAS (2020c) and CNAS (2021b).

<sup>100</sup> Wedel (2016).

<sup>101</sup> Campbell, Edelman, Flournoy, et. al. (2016).

Capitol Hill to disclose any foreign government funding their think tanks receive.<sup>102</sup> A recent 2021 update by Reps. Katie Porter (D-CA) and James McGovern (D-MA) strengthened these rules and expanded them to include all financing that poses any conflict of interest. However, loopholes still exist which allow the majority of think tank experts whose employers are opaque about their funding sources to dodge these disclosures, and even experts at the minority of relatively transparent think tanks still possess the means to skirt the rules.<sup>103</sup> These rules should be further strengthened to eliminate the ability of congressional witnesses to dodge them.

There are likely many think tanks who are hiding their own conflicts of interest by being less transparent than CNAS in listing their donors. Last October, then-secretary of state Mike Pompeo called on “think tanks and other foreign policy organizations that wish to engage with the Department [to] disclose prominently on their websites funding they receive from foreign governments, including state-owned or state-operated subsidiary entities.”<sup>104</sup> While this is a step in the right direction, a voluntary request for disclosures is an inadequate solution to the problem, and the range of concerning donors requiring disclosures extends beyond foreign governments.

The IRS could mandate financial transparency by requiring that all think tanks make their full list of donors contributing at least \$5,000 (a list each organization already files in its taxes) public.<sup>105</sup> Additionally, the Biden administration can explore executive or legislative actions to condition future US government funding of think tanks on adherence to a set of minimum transparency and accountability requirements, including proper conflict of interest disclosures.

In any case, President Biden should turn against the immense corruption emblematic of the Trump administration and set high standards for the selection of personnel, including detailed disclosures of past work by all major appointees and nominees. As Biden continues to choose staffers to fill out his administration, there are clear choices he can make to create a more peaceful and more secure world without damaging the moral integrity of his nascent administration.

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<sup>102</sup> Dennett (2018).

<sup>103</sup> Clifton (2021).

<sup>104</sup> Pompeo (2020).

<sup>105</sup> Freeman (2020).

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