



December 4, 2025

Juliet T. Hodgkins
Acting Inspector General
U.S. Department of Health and Human Services
330 Independence Avenue, SW
Washington, DC 20201

Dear Acting Inspector General Hodgkins:

Democracy Defenders Fund (DDF) respectfully requests that you investigate whether BlinkRx, a company with ties to Donald Trump Jr., received nonpublic information that could lead to an unfair competitive advantage in its bid to administer TrumpRx in violation of the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. § 2635, and the federal contracting rules. Representations made by BlinkRx staff, taken together with an unusually close relationship between BlinkRx and the Trump administration and the precise timing of BlinkRx's offering of Direct to Consumer (DTC) services, suggest that the company may have received material nonpublic information. At a time when many Americans are struggling to afford prescription drugs, it is imperative that the administration adhere to fair and transparent processes to ensure the lowest costs and best services for patients.

Background

In February of 2025, BlinkRx, a mid-sized company that helps drug manufacturers build DTC platforms that allow drug companies to sell drugs directly to consumers, announced that President Trump's son, Donald Trump Jr., would be joining its Board of Directors.¹ His appointment followed the November 2024 news that he became a partner at 1789 Capital, an investment firm that led a \$140 million funding round for BlinkRx earlier that year.² Since then, BlinkRx has on several occasions appeared to benefit from a close relationship with the Trump administration.³

Six months after Donald Trump Jr. joined BlinkRx, on July 31, 2025, President Trump took what appears to be his first-ever action on DTC healthcare systems, giving a wholesale endorsement of the method by sending letters to several large pharmaceutical manufacturers

¹ *BlinkRx Welcomes Donald Trump Jr. to Board of Directors*, PR NEWswire (Feb. 6, 2025), <https://www.prnewswire.com/news-releases/blinkrx-welcomes-donald-trump-jr-to-board-of-directors-302370329.html>.

² Annie Linskey & Josh Dawsey, *Trump Wants to Overhaul Drug Sales. A Company Tied to His Son Stands to Benefit*, WALL STREET JOURNAL (Oct. 7, 2025), https://www.wsj.com/health/pharma/trumprx-drug-companies-blinkrx-2b6e1761?gaa_at=eafs&gaa_n=AWETsqctR5zgmEMoemzxGS4wQXUo8N8RWunR5FaNrkrXDQlkyDJuFwVCMoBdUvnFR8%3D&gaa_ts=69011d6b&gaa_sig=MWHEQAMeBxHqEG9aijogqpg8SfYwh70szW0tXUWhjOvy4Q9kqO_B2fk1ACSzoTKt3bEIR6u6ZSIIG1kALjfrPQ%3D%3D.

³ *Id.*

calling on them to adopt DTC models for some of their products within 60 days.⁴ A week later, on August 7, 2025, BlinkRx launched “Operation Access Now,” a program that allows pharmaceutical manufacturers to launch DTC programs in “as little as 21 days.”⁵ Despite claims by a company lawyer that the release was “issued to raise awareness of an existing product,” BlinkRx’s release provided several indications that Operation Access Now is a new offering.⁶ Since then, drugmakers like Amgen, AstraZeneca, and Bristol Myers Squibb have announced that they are launching DTC platforms, although it is not clear whether any used BlinkRx’s services to do so.⁷

In mid-September, as President Trump was “stepping up negotiations with pharmaceutical companies” related to their adoption of DTC models, BlinkRx invited many of the companies that received a letter from the President to a “Future of Pharmaceuticals” summit.⁸ The summit schedule advertises “small group” meetings with several top Trump administration officials, including Health and Human Services (HHS) Secretary Robert F. Kennedy Jr., Centers for Medicare and Medicaid Services (CMS) Administrator Mehmet Oz, and Food and Drug Administration (FDA) Commissioner Marty Makary, and a dinner at Donald Trump Jr.’s club.⁹ While BlinkRx’s Vice President says that “no company will be pitching any services,” at the event, another person familiar with the summit acknowledged “there is always a business angle.”¹⁰ The Wall Street Journal reported:

The invitation to the “Future of Pharmaceuticals” summit prompted consternation among some drug-company representatives, who worried that the gathering signaled that the White House wants them to work with the little-known BlinkRx because of its ties to the president’s family.¹¹

Further, on the last day of September, President Trump announced the forthcoming rollout of “TrumpRx,” a government website that will connect consumers to DTC drug websites.¹² Days before this announcement, a BlinkRx representative told a drug company that, “BlinkRx could be involved with running [TrumpRx.gov] on behalf

⁴ White House Rapid Response (@RapidResponse47), X (July 31, 2025 at 14:28 ET) <https://x.com/RapidResponse47/status/195098694329010015/photo/1>.

⁵ *BlinkRx Launches “Operation Access Now” to Accelerate and Scale Direct-to-Patient and Direct-to-Business Programs*, BUSINESSWIRE (Aug. 7, 2025), <https://www.businesswire.com/news/home/20250807070685/en/BlinkRx-Launches-Operation-Access-Now-to-Accelerate-and-Scale-DirecttoPatient-and-Directtcompay'soBusiness-Programs>.

⁶ Rachel Cohrs Zhang, *Firm Tied to Trump Jr. Touts Sales Product for Pharma*, BLOOMBERG (Aug. 11, 2025), <https://www.bloomberg.com/news/articles/2025-08-11/firm-tied-to-trump-jr-debuts-direct-sales-product-for-pharma>.

⁷ Andrea Park, *Planned summit hosted by DTC specialist BlinkRx raises concerns over ties to Trump admin: WSJ*, FIERCE PHARMA (Oct. 9, 2025), <https://www.fiercepharma.com/marketing/blinkrx-hosted-summit-prompts-concerns-over-ties-trump-administration-wsj>.

⁸ Linksey, *supra* note 2.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *TrumpRx*, <https://trumprx.gov/>; Sydney Lupkin, *President announces TrumpRx website for drugs, and pricing deal with Pfizer*, NPR (Sep. 30, 2025), <https://www.npr.org/sections/shots-health-news/2025/09/30/nx-s1-5558432/drug-prices-trumprx-pfizer>.

of the Centers for Medicare and Medicaid Services.”¹³ The White House has not publicly denied BlinkRx’s claims. More importantly, there is no indication that an open competitive federal procurement process is currently in the works or that Congress has appropriated funds or issued legislation for this specific program.¹⁴

Discussion

The appearance of a close relationship between BlinkRx and the Trump administration raises serious questions about potential sharing of nonpublic information that could create an unfair competitive advantage to BlinkRx. These concerns are particularly troubling given the bipartisan chorus of former ethics officials who have raised concerns about the unprecedented potential for President Trump and his administration to use public office for the President and his family’s private gain.¹⁵

Several federal laws and regulations restrict employees’ use of nonpublic information for their own private gain or the gain of another.¹⁶ Among these restrictions are the Standards of Ethical Conduct for Employees of the Executive Branch and rules related to unfair and unequal contractor access to contract information. The timing of BlinkRx’s DTC announcement, coupled with the company’s unusual level of access to key decision-makers, including the President, raises a serious concern that nonpublic information was shared with BlinkRx in violation of some or potentially all of these restrictions.

To prevent corruption, including the conferment of improper advantages to private companies, the Standards of Ethical Conduct for Employees of the Executive Branch impose upon all employees of the executive branch “responsibility to the United States Government and its citizens to place loyalty to the Constitution, laws, and ethical principles above private gain.”¹⁷ This means, amongst other things, that an employee cannot “give preferential treatment to any private organization or individual.”¹⁸ In addition, the Standards provide that:

Employees may not engage in financial transactions using nonpublic information, nor allow the improper use of nonpublic information to further their own private

¹³ Linksey, *supra* note 2.

¹⁴ As of time of publication, no notice related to TrumpRx has appeared on [SAM.gov](https://sam.gov), the federal government’s central database for contract opportunities and reporting.

¹⁵ Laura Barrón-López et al., *Ethics expert breaks down Trump Administration’s conflicts of interest*, PBS (Mar. 14, 2025), <https://www.pbs.org/newshour/show/critics-accuse-tinreceivingcontractorsluderump-and-others-of-profiting-from-t heir-positions>; Norman Eisen, Virginia Canter & Richard W. Painter, *A Plane from Qatar? C’mon, Man*, NEW YORK TIMES (May 14, 2025), <https://www.nytimes.com/2025/05/14/opinion/trump-plane-qatar-crypto.html>.

¹⁶ *See, e.g.*, 41 U.S.C. § 2102 (prohibiting employees from providing contractors with bid and source selection information); 41 C.F.R. § 3.104-3; 5 C.F.R. § 2635.703. Previously, Congress has underscored the importance of preventing misuse of nonpublic information by federal officials by clarifying that all Federal employees have a fiduciary responsibility to the government when holding such information under the Federal securities laws. STOCK Act, P.L.112-105, § 9, 126 Stat. 297-298 (codified at 15 USC 78j(h)(1), note) (“[N]o executive branch employee may use nonpublic information derived from such person’s position as an executive branch employee or gained from the performance of such person’s official responsibilities as a means for making a private profit”).

¹⁷ 5 C.F.R. §§ 2635.101(a), 101(b)(1).

¹⁸ *Id.* at § 2635.101(b)(7)-(8).

interests or those of another, whether through advice or recommendation, or by knowingly unauthorized disclosure.¹⁹

This restriction applies to all nonpublic information that may help a company secure benefits, such as a contract, from the government on unfair terms.²⁰ An example of the application of the regulations illustrates: “[a] General Services Administration employee involved in evaluating proposals for a construction contract cannot disclose the terms of a competing proposal to a friend employed by a company bidding on the work.”²¹

Federal acquisition law builds on the general prohibition on government officials' abuse of nonpublic information by providing that contracts tainted by nonpublic information may be challenged for unfair advantages. For example, the Procurement Integrity Act prohibits an employee from providing procurement information before the award of a procurement contract.²² In addition, the Federal Acquisition Regulation (FAR) requires agencies to take steps to avoid organizational conflicts of interest that would provide an unfair competitive advantage to a contractor.²³ The FAR highlights that two types of information may provide a contractor with an unfair advantage: proprietary information and source selection information.²⁴ However, the FAR also recognizes that “conflicts may arise in situations not expressly covered” and “[e]ach individual contracting situation should be examined on the basis of its particular facts and the nature of the proposed contract.”²⁵ As a result, the Government Accountability Office (GAO) and courts have found that an unfair competitive advantage can occur anytime a contractor is provided with access to “relevant nonpublic information... that would assist it in obtaining the contract.”²⁶ Congress itself recognized that unequal access to information is problematic in 2022, and charged the FAR Council with updating the FAR to ensure that such organizational conflicts of interest were expressly prohibited.²⁷

The close timing of the administration's unprecedented announcements promoting DTC policies with BlinkRx's release of products and mention of a potential contract for TrumpRx, something none of its competitors came close to replicating, suggests that the company has been made privy by the administration to information that was not available to the public. BlinkRx's apparent ability to secure the presence of several high-ranking administration officials at its upcoming conference reinforces speculation that BlinkRx is benefitting from an inappropriately

¹⁹ 5 C.F.R. § 2635.703(a).

²⁰ *Id.* § 2635.703; OGE Inf. Adv. Op. 06 x 7 (2006); *Gagliardo v. Dep't of Transportation*, No. DC-0752-15-0117-I-1, 2023 WL 182704, at *1 (M.S.P.B. Jan. 13, 2023) (upholding removal of employee for, among other things, using nonpublic information to provide advice to a potential contractor during a negotiation).

²¹ 5 C.F.R. § 2635.703, Example 2.

²² 41 U.S.C. § 2102; 41 C.F.R. § 3.104-3(a).

²³ FAR § 9.505.

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Johnson Controls World Servs., Inc.*, B-286714.2 (Feb. 13, 2001); see also *Alabama Aircraft Indus., Inc.-Birmingham v. United States*, 83 Fed. Cl. 666, 688 (2008); *rev'd on other grounds*, 586 F.3d 1372, 1376 (Fed. Cir. 2009).

²⁷ Preventing Organization Conflicts of Interest in Federal Acquisition Act, P.L. 117-324, 2(a)(1)(A), 136 Stat. 4439 (Dec. 27, 2022).

close relationship with administration employees. To the extent that BlinkRx and its clients are given any preferential treatment over its competitors and their clients with respect to the development and administration of the TrumpRx platform, it would appear to violate the Standards of Conduct. This scenario is alarming: Blink stands to earn tens of thousands of dollars from business with drug manufacturers and even the administration, a portion of which will likely flow into Donald Trump Jr.'s pocket.

Conclusion

Americans deserve to know for certain that the government is facilitating a fair and free healthcare marketplace and choosing to contract with providers because they are the best option, not because they have a special advantage due to their relationship with the President and his family. The government must not risk the appearance that a company is being fed non-public information that could deliver them tens of thousands of dollars because the President's son happens to sit on their board, especially one for a service that the administration touts as a solution to healthcare costs at a time when many people are facing crushing insurance premium hikes.²⁸ DDF requests that you investigate this matter.

Sincerely,

/s/

Ambassador Norman Eisen (ret.)
Executive Chair and Founder
Democracy Defenders Fund

/s/

Virginia Canter
Ethics and Anticorruption Chief Counsel and Director
Democracy Defenders Fund

/s/

Chris Swartz
Senior Ethics Counsel
Democracy Defenders Fund

²⁸ Cythia Cox, *ACA Insurers Are Raising Premiums by an Estimated 26%, but Most Enrollees Could See Sharper Increases in What They Pay*, KFF (Oct. 28, 2025), <https://www.kff.org/quick-take/aca-insurers-are-raising-premiums-by-an-estimated-26-but-most-enrollees-could-see-sharper-increases-in-what-they-pay/>.