

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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July 17, 2025

Ms. Bethany Davis Noll
Executive Director
The State Energy & Environmental Impact Center
New York University School of Law
40 Washington Sq. South
New York, NY 10012

Dear Ms. Davis Noll:

The Committee on Oversight and Government Reform is investigating ties between the New York University School of Law's (NYU) State Energy & Environmental Impact Center (State Impact Center) and several offices of state attorneys general. Since 2016, State Impact Center fellows use their positions at state attorneys general offices to file activist lawsuits and lobby for more burdensome regulations.¹ Michael Bloomberg established the State Impact Center² and NYU pays the salaries of the State Impact Center fellows.³ The arrangement, through which a partisan donor provides funding to NYU to pay law school fellows' salaries while those fellows work not at NYU but in the offices of state attorneys general, raises ethical concerns and questions about the independence of state governments. It also undermines faith in the American legal system. In furtherance of the Committee's investigation into "the regulatory costs, bad policies, and veiled special interests that defined the Biden Administration,"⁴ we are seeking documents and information from Bloomberg Philanthropies about decisions to fund staff embedded within the offices of several state attorneys general.

In 2016, Bloomberg Philanthropies provided a grant to establish the State Impact Center at NYU.⁵ Many of the projects that the State Impact Center's fellows lead fit squarely within Bloomberg Philanthropies' "Beyond Carbon" and "Beyond Petrochemicals" campaigns.⁶ The

¹ Caroline Cournoyer, *In Fighting Trump's Environmental Rollbacks, State AGs Get New Help*, GOVERNING (Aug. 18, 2017), available at <https://www.governing.com/archive/state-ags-get-new-help-fighting-trumps-environmental-rollbacks.html>.

² News Release, NYU Law, NYU Law launches new center to support state attorney general in environmental litigation (Aug. 17, 2017).

³ *Fellows Program*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER, available at <https://stateimpactcenter.org/about/fellows-program>.

⁴ See Letter from James Comer, Chairman, H. Comm. on Oversight and Gov't Reform, to Doug Burgum, Sec'y, U.S. Dep't of the Interior, et al. (Feb. 18, 2025).

⁵ *Supra*, n.2.

⁶ *Advancing Clean Energy*, BLOOMBERG PHILANTHROPIES, available at <https://www.bloomberg.org/environment/advancing-clean-energy/>

State Impact Center's advisory council also includes executives from the "green" energy industry who have an interest in undermining fossil fuels.⁷ As discussed above, NYU's State Impact Center pays the salaries of special assistant attorneys to work on select energy and environmental cases.⁸ For example, according to agreements between NYU and the Office of the Minnesota Attorney General, the State Impact Center's fellows are included in "strategy discussions and court appearances."⁹ The founder of Bloomberg Philanthropies, Mr. Bloomberg, has provided hundreds of millions of dollars for partisan climate-focused advocacy campaigns and has a clear interest in influencing actions by state attorneys general.¹⁰

The Bloomberg-NYU program follows a playbook similar to that used by Mr. Bloomberg and like-minded activists at the Sierra Club. Mr. Bloomberg provided \$80 million for Sierra Club's "Beyond Coal" campaign, which aims to shut down every coal-fired plant in the country.¹¹ Beyond Coal used Mr. Bloomberg's donation to hire lawyers to argue in courtrooms for the closure of these plants.¹² As the former director of the State Impact Center, David Hayes, said, "there's never enough" funding to support environmental advocacy and NYU's grant would support litigation against the federal government and for enforcement activities in states.¹³ While Mr. Bloomberg disguises his donations as "philanthropy," the State Impact Center is a mechanism for him to skirt legislative bodies and effect partisan policy.

The State Impact Center describes itself as a nonpartisan organization that "supports the work of state attorneys general in defending, enforcing and promoting strong laws and policies in the areas of climate, environmental justice, environmental protection, and clean energy."¹⁴ However, there are no known examples of State Impact Center fellows working for Republican attorneys general offices.¹⁵ The State Impact Center's database strongly indicates that the program prioritizes Democratic policies, such as protecting Biden Administration regulations,¹⁶

⁷ Thomas Catenacci, *Meet the Bloomberg-Funded Official Who is Behind the DC AG's Top Climate Initiatives*, THE WASHINGTON FREE BEACON (May 5, 2025), available at <https://freebeacon.com/energy/meet-the-bloomberg-funded-official-who-is-behind-the-dc-ags-top-climate-initiatives/>.

⁸ *Supra*, n.3.

⁹ *Employee Second Agreement between the Office of the Minnesota Attorney General and the State Energy & Environmental Impact Center at NYU School of Law*, accessed June 23, 2025, available at <https://climatelitigationwatch.org/wp-content/uploads/2020/08/5.24.19-MN-OAG-NYU-secondment-agreement.pdf>

¹⁰ *Bloomberg Philanthropies*, INSIDE PHILANTHROPY, available at <https://www.insidephilanthropy.com/find-a-grant/grants-b/bloomberg-philanthropies>.

¹¹ Juliet Eliperin, *NYU Law launches new center to help state AGs fight environmental rollbacks*, WASHINGTON POST (Aug. 16, 2017); *id.*

¹² *Id.*

¹³ Cournoyer, *supra* note 1.

¹⁴ Home, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER, available at <https://stateimpactcenter.org/>.

¹⁵ *Apply to be an NYU Law Fellow*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER, available at <https://stateimpactcenter.org/about/fellows-program/apply>; *How to Hire an NYU Law Fellow- AG Offices*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER, available at <https://stateimpactcenter.org/about/fellows-program/hire>.

¹⁶ *Sixteen AGs Intervened to Defend EPA's Implementing Regulations under 111(d) of the Clean Air Act*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER (Feb. 15, 2024), available at <https://stateimpactcenter.org/ag-work/ag-actions/sixteen-ags-intervened-to-defend-epas-implementing-regulations-under-111d-of-the-clean-air-act>.

attacking Trump Administration executive orders,¹⁷ and targeting unfavored industries such as natural gas and petrochemicals.¹⁸ Recently, a State Impact Center fellow acted on behalf of the Washington, D.C. attorney general to submit comments on President Trump's interim National Environmental Policy Act regulations.¹⁹ In 2024, a State Impact Center fellow submitted comments on behalf of the Washington, D.C. attorney general in support of proposed national drinking water regulations.²⁰ In 2023, the same assistant attorney general wrote comments in support of a proposed federal study on "chronic hazards associated with gas ranges and proposed solutions."²¹ Assistant attorneys general from NYU in the Washington, D.C. attorney general's office have helped lead multiple environmental lawsuits against petrochemical companies.²² In 2021, the attorney general of Connecticut used State Impact Center fellows to carry out a lawsuit against a natural gas company.²³ While it is common practice for states to hire outside counsel, the Bloomberg-NYU program is highly ideological and devoted to serving partisan interests.

The role of an attorney general is vital to America's legal system. The Bloomberg-NYU program, however, undermines faith in that system. The circumstances surrounding the State Impact Center raise questions as to whether participating state attorneys general are acting on independent judgement to best serve the interests of their states' citizens. The Bloomberg-NYU program effectively offers states partisan money from a billionaire to carry out official functions of their offices. Currently, Wisconsin dairy farmers are suing Wisconsin's attorney general over the office's agreement with NYU because they believe it denies due process and equal protection under the law.²⁴ The Bloomberg-NYU partisan agenda will likely hurt working-class Americans in the name of the partisan globalist climate-agenda. The average American household will pay

¹⁷ *Seventeen AGs Sought the Restoration of Congressionally-Appropriated EV Funds*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER (May 7, 2025), available at <https://stateimpactcenter.org/ag-work/ag-actions/seventeen-ags-sought-the-restoration-of-congressionally-appropriated-ev-funds>.

¹⁸ *Seventeen AGs Supported Minnesota's Climate Case in Amicus Brief*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER (Aug. 25, 2021), available at <https://stateimpactcenter.org/ag-work/ag-actions/seventeen-ags-supported-minnesotas-climate-case-in-amicus-brief>; *Maryland AG Filed Lawsuits against Chemical Companies, Including 3M and DuPont, over PFAS Manufacturing*, STATE ENERGY & ENVIRONMENTAL IMPACT CENTER (May 30, 2023), available at <https://stateimpactcenter.org/ag-work/ag-actions/maryland-ag-filed-lawsuits-against-chemical-companies-including-3m-and-dupont-over-pfas-manufacturing>.

¹⁹ Comments of Attorneys General of Washington, California, New York, Arizona, Colorado, Connecticut, District of Columbia, Delaware, Harris County, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, New Jersey, New Mexico, Oregon, Vermont, and Wisconsin, State Energy & Environmental Impact Center, to Jomar Maldonado Vazquez, Director for NEPA (Mar.27, 2025).

²⁰ Comments of the Attorneys General of New York, California, Connecticut, Illinois, Maryland, Massachusetts, Michigan, Minnesota, New Jersey, Oregon, Pennsylvania, Rhode Island, Wisconsin, and the District of Columbia, State Energy & Environmental Impact Center, on the Environmental Protection Agency's Proposed National Primary Drinking Water Regulations for Lead and Copper: Improvements (Feb. 5, 2024).

²¹ Comments of the Attorneys General of the District of Columbia, Delaware, Maryland, Massachusetts, Minnesota, New York, Rhode Island, Oregon, Vermont, Washington, and the City of New York, State Energy & Environmental Impact Center, to Alberta E. Mills, Consumer Product Safety Comm'n (May 8, 2023).

²² Mark Segraves, *DC AG sues contractor alleging decade of polluting waterways*, NBC Washington (Oct. 17, 2024).

²³ Marc E. Fitch, *Attorney General Tong using Bloomberg-funded attorneys to pursue environmental litigation*, YANKEE INSTITUTE (Oct. 6, 2021), available at <https://yankeeinstitute.org/2021/10/06/attorney-general-tong-using-bloomberg-funded-attorneys-to-pursue-environmental-litigation/>.

²⁴ Complaint, *Wis. Dairy Alliance v. Kaul*, (No. 25-cv-00022), 2025.

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the cost of this destructive agenda in the form of subsidies and regulations, fewer energy options, taxes to fund federal agencies' legal defense, and higher utility bills.

To assist the Committee's oversight of this matter, we request the following information no later than July 31, 2025:

1. All documents and communications within NYU's State Impact Center regarding the placement of fellows at state attorney general's offices;
2. All communications between NYU's State Impact Center and state attorney generals' offices;
3. All communications between NYU's State Impact Center and Bloomberg Philanthropies.

To ask any related follow-up questions, please contact the Committee on Oversight and Government Reform Majority staff at (202) 225-5074. The Committee on Oversight and Government Reform is the principal oversight committee of the U.S. House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "James Comer". The signature is fluid and cursive, with the first name "James" and last name "Comer" clearly distinguishable.

James Comer

Chairman

Committee on Oversight and Government Reform

cc: The Honorable Robert Garcia, Ranking Member
Committee on Oversight and Government Reform