



Stop the Coup 2025
a public education and mobilization campaign

SUMMARY
BY CHAPTER
OF PROJECT 2025
*(The Presidential Transition Project
of the US Conservative Party)*

PRODUCED BY STOP THE COUP 2025

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INTRODUCTION

Stop the Coup 2025 is a nonpartisan, nonprofit, progressive public education, and mobilization campaign to stop Project 2025, the conservative movement’s detailed electoral blueprint to dismantle the US federal government and our system of democracy.

Project 2025 is also known as the “Presidential Transition Project of the US Conservative Party,” an electoral playbook for a GOP 2025 victory. Project 2025 was released as a PDF document and in book form in summer 2023 by The Heritage Foundation. The blueprint is 887 pages long, broken down into 30 chapters, each covering a department of the federal government. The chapters were written by a different author or coauthors, many of them former officials from the 2016 Trump administration, as well as 400 scholars and policy experts from across the conservative movement and US. It was edited by the leadership of The Heritage Foundation, which is guiding its promotion.

Project 2025’s overarching goal is a “top to bottom” blueprint for systematic reform of the current federal system of governance to “destroy the Administrative State.” That includes a sweeping and targeted goal of removing, or rolling back, federal policies deemed to be examples of “leftist wokeism”: programs to support gender and LGBTQ+ civil rights, Diversity, Equity and Inclusion (DEI), and Biden policies in energy, environmental policy, defense, and international aid – among key sectors.

Our goal: an objective breakdown of Project 2025’s detailed proposals to reshape the federal government

Editorial Approach: Our chapter-by-chapter breakdown, below, mirrors the editorial content of the Project 2025 blueprint: one chapter per department of the federal government. Our summary was produced by a small editorial team of the Stop the Coup 2025 campaign.

Our goal here is to provide a straightforward, non-editorialized, brief overview of the main ideas presented in each chapter, followed by a bulleted list of key recommendations for restructuring the department, and our editorial commentary about the proposed reforms.



Stop the Coup 2025
a public education and mobilization campaign

This Summary (as well as the 30 individual chapter summaries), and a condensed 10-page Key Points” document of key proposals, are available for free download at our website: www.stopthecoup2025.org. We have posted the full Project 2025 blueprint there, too, as well as materials, reports, and news related to the conservative agenda, including resources for community education and mobilization.

Project 2025: Background & Vision: “Project 2025” marks the second major vision document, or Mandate for Leadership, by Christian right groups; the first was in 1981, the year Ronald Reagan became president. By the end of that year, sixty percent of their proposed reforms had become policy, they claim. After Trump was elected in 2016, conservatives pushed through two-thirds of their fifth Mandate for Leadership agenda.

As the newest vision paper, Project 2025 carries forward the unfinished proposals of 2016 and 2022, but represents a major departure in both the scope and the granular detail of its ambition to recapture the White House and overhaul our system of government and power structure.

Ideology: Project 2025 backs a vision of a smaller federal government, shifting decision-making power to the state level of government and, where possible, shifting government functions and responsibilities to the private sector. That’s not a surprise. But in what marks a radical departure, it backs a “unitary executive theory” of power, giving special, unprecedented, “supreme” powers to the Executive branch to carry out these reforms. Such a step would radically alter our present US democratic system of checks and balances. Many of the reforms proposed for various agencies are aimed at reducing or delaying the oversight power of Congress and the courts to oppose the rapid implementation of Project 2025’s agenda.

Project 2025 also calls for aligning federal domestic and foreign policy with conservative Christian religious values. It would replace secular public education with Christian-based education, and shift public education dollars to private and Christian schools. Project 2025’s vision is not only an embrace of authoritarianism, but envisions a future Christian-led theocracy.

Project 2025 seeks to eliminate or merge key government regulatory departments and agencies, and drastically reverse current Biden domestic and foreign policy in every critical sector. Some proposals call for the creation of novel “parallel” advisory bodies from the private sector, to be given new authority to advise, create, or revise federal policy, with a direct line of access to the next GOP president.

Legal Defense: Recruits include private lawyers and legal firms who are among a projected “army” of some 5,000 loyalist lawyers being vetted to join the next administration and defend its radical proposals. Project 2025 highlights the critical role of the Office of the General Counsel and lawyers in various departments who are positioned as key players in the takedown of the leftist “deep state.”

While many conservatives favor Donald Trump for the top job, Project 2025 makes clear that its proposals are not about who becomes president, but who agrees to carry out its extreme big-picture agenda. Put simply, Project 2025 represents the Republican Party’s vision: it *is* the



Stop the Coup 2025

a public education and mobilization campaign

GOP's platform. What was once deemed extreme and unimaginable – a Christian theocracy for America, supplanting democracy – has become a unifying mandate.

Playbook: Project 2025 includes a 180-day “playbook” of key implementation steps to be taken in the first six months of 2025 under a new Republican president. As the current GOP front-runner, Donald Trump has indicated his willingness to implement this radical GOP vision.

To execute their ambitious plan, Project 2025's architects aim to recruit and train 20,000 conservative Christian loyalists to replace career civil servants, starting with high-level positions. They are relying on presidential Executive Orders to enact overnight personnel and policy changes. On “Day One” loyalists will be placed in “acting” high-level positions, authorized by Executive Order to carry out decisions for the department. Some will be “acting” nominees that require Senate confirmation hearings; others do not.

Project 2025 calls for “agency teams” of experienced department heads to train and advise recruits for key positions. Recruits are to be ready to step into power on January 20, 2025. Recruitment is under way. As of November 2023, over 5000 candidates had submitted resumes to The Heritage Foundation for consideration to join the next GOP government. The main task of new recruits is “rulemaking” -- to write or revise policy – that adheres to conservative Christian values, ideology, and political goals. Recruits are being asked to prove their fealty to Project 2025's agenda.

Loyalty Tests: It's not only conservatives whose loyalty is sought. Project 2025 plans a “Day One” step of using Schedule F, a legal instrument, to begin reassigning -- removing -- some 50,000 career civil service employees. These federal employees can lose their pensions as a result. Those who stay will have to prove they are ready to carry out the president's agenda.

Training for 2025: Project 2025 calls for creating an online training institute, the “Presidential Administration Academy,” taught by Project 2025 coalition members, to teach conservative recruits “how the government functions and how to function in government,” with a focus on rewriting rules aligned with Christian conservative values and ideals. Training has already begun, via online courses that Project 2025 has created for candidate hires.

The Cultural Agenda: anti-LGBTQ, anti-Diversity, anti-Democracy, anti-Labor, anti-Environment....

Project 2025 has a cultural, ideological agenda heavily focused on immediate and complete reversal of many policies designed to tackle systemic inequities, as well as the negative impacts of climate change on our planet, including in the agricultural and energy sectors.

Anti-gender: As stated in the foreword: *“This starts with deleting the terms sexual orientation and gender identity (“SOGI”), diversity, equity, and inclusion (“DEI”), gender, gender equality, gender equity, gender awareness, gender-sensitive, abortion, reproductive*



Stop the Coup 2025

a public education and mobilization campaign

health, reproductive rights, and any other term used to deprive Americans of their First Amendment rights out of every federal rule, agency regulation, contract, grant, regulation, and piece of legislation that exists.” Step One is eliminating the current Gender Policy Council, which is responsible for assuring implementation of gender reforms across government.

Project 2025 calls for rolling back recent LGBTQ+ gains in civil rights, including gay marriage and protection from discrimination. It criminalizes transgender identity as predatory and a threat to children, and on a par with pornography. The authors call for imprisoning anyone who produces or distributes pornography, for registering educators and librarians who purvey it as sex offenders, and shuttering telecommunications and technology firms who facilitate its spread.

Anti-Diversity: Project 2025 similarly takes aim at racial justice, “progressive wokeness,” DEI – diversity, equity, and inclusion -- and racial equality, firmly opposing the concept of affirmative action. It calls for erasure and reversal of reforms related to DEI as well as accessibility and racial equality. States Project 2045: “*The noxious tenets of ‘critical race theory’ and ‘gender ideology’ should be excised from curricula in every public school in the country.*” The entire Mandate for Leadership document takes the extraordinary position that to recognize race as a category is *in itself racist*; thus any DEI attempts to promote better understanding of how racial inequality functions in the present day are racist. It calls for replacing public school and secular education with Christian education, redirecting federal education money to private, Christian-led institutions, and aligning policy with Christian religious values.

Anti-Immigrant, divisionist, nativist: Project 2025 espouses a nativist ideology and divisive rhetoric, pushing a priority conservative goal of “sealing America’s border.” It criminalizes asylum seekers and immigrants, pitting citizens against aliens out to threaten their jobs and cities. It seeks to militarize the border, detain 100,000 non-US citizens in mass camps, and deport millions, including unaccompanied children, back to home countries in conflict.

Isolationist: Project 2025 takes aim at America’s role abroad, too. In foreign policy, Project 2025 reflects a traditional GOP isolationist position, pushing an “America First” international trade policy. It views China and its Communist government as a key enemy and economic threat. In the arena of defense and national security, Project 2025 calls for a historic policy departure, away from deterrence in areas of missile, space, and nuclear defense – an alarming position. It also calls for realigning US foreign policy at USAID and foreign assistance with conservative ideology and Christian values, and eliminating aid to groups or projects abroad that are not aligned with these principles. If enacted, the plan would have a major global impact.

Anti-environment, anti-labor: Project 2025 calls for a complete reversal of policies and funding for programs that support environmental protection and counter the negative impacts of climate change. It seeks to open up protected natural areas to private commercial



Stop the Coup 2025
a public education and mobilization campaign

activity, and limit regulations on businesses. Regarding Labor, Project 2025 sides with corporate interests, and calls for reducing the role of public sector unions, and transferring many government jobs to the private sector. The use of Schedule F to mass-fire many career federal employees is a staunch anti-labor move.

Anti - Democracy: Project 2025 details its tacit embrace of authoritarianism, via the call to invest a president with unprecedented powers, eliminate or reshuffle Cabinet and other high-level positions, stock the government with loyalists, and fire career professionals who might resist the GOP takeover. While arguing for transparency, it calls for giving private groups unprecedented access and decision-making authority to help govern the country.

Going further, Project 2025 call for using the US military to assist the FBI and domestic law enforcement in conducting domestic surveillance. It calls for clamping down on groups who dissent with the president’s agenda, in the name of fighting domestic terrorism.

Taken together, these reforms advance a vision for autocracy and Christian theocracy – a combination never seen in US history.

MAJOR GOALS OF PROJECT 2025:

KEY PROPOSALS:

On democracy and US system of government:

- ✓ Systematically dismantle and reorder the federal government – “the Administrative state”
- ✓ Give the Executive branch unprecedented “supreme” powers – an autocracy move
- ✓ Champion ‘ordered liberty’ – limiting some individuals rights to maintain social order
- ✓ Revise the Executive Order related to the Intelligence Reform and Terrorism Prevention Act of 2004 to give the next administration expanded powers to conduct domestic intelligence activities that might infringe on civil liberties and privacy
- ✓ Recruit and train 20,000 conservatives to replace career officials by January 20, 2025
- ✓ Appoint conservative “activist” lawyers and supporters to key governance positions
- ✓ Establish a Presidential Administrative Academy to train conservatives to join the government
- ✓ Launch a 180-day implementation playbook for administrative takeover on Jan. 20, 2025

Labor:

- ✓ Use Schedule F to eliminate some 50,000 career federal workers, replace with loyalists and bring in private sector and outside experts to advise key agencies, take over duties
- ✓ Restore Trump-era Executive Orders to boost management vs. union power



Stop the Coup 2025 a public education and mobilization campaign

In foreign policy, intelligence, and defense:

- ✓ Promote a US nativist foreign policy, and reverse US foreign policy in trade, energy, climate, defense
- ✓ In a historic first, reverse US policy of deterrence-only for missile and space defense
- ✓ Oppose the authority of international bodies like the United Nations
- ✓ Fight China, limit China imports/exports and block technology firms such as Tik Tok
- ✓ Freeze all existing Biden international treaties to assure they align with GOP presidential agenda and foreign policy objectives
- ✓ Transfer away US foreign assistance to large “corrupt” UN agencies, global NGOs, and contractors and refocus on local agencies on the ground, especially faith-based groups

On gender and LGBTQ+ issues:

- ✓ Eliminate all mention or protection of gender & LGBTQ+ identity in all federal government rules and regulations, and criminalize transgender identity
- ✓ Reverse gay marriage, gays in the military, LGBTQ+ family federal protections
- ✓ Expel individuals with ‘gender dysphoria’, and cut public funding for gender-affirming surgery or to facilitate abortion for military personnel
- ✓ Eliminate the Gender Policy Council to end any promotion of abortion, comprehensive sexuality education, “woke” gender ideology, including support for gender-affirming care
- ✓ Oppose reproductive health; eliminate all access to abortion
- ✓ Reinstate and expand the ‘Mexico City Policy’ (‘Protecting Life in Global Health Assistance (PLGHA) that denies pro-abortion policies as a condition of getting US aid
- ✓ Champion the nuclear family and provide tax incentives for heterosexual marriage, churches

On diversity, civil rights, education:

- ✓ Reduce the authority of the Office of Civil Rights and Civil Liberties
- ✓ Eliminate USAID’s DEI policy apparatus, including Chief Diversity Officer position, DEI advisors, committees; remove DEI requirements from contract tenders
- ✓ Roll back racial equality, diversity, DEI, “wokeness” and affirmative action efforts and policies; eliminate Title IX and VI (SOGI, CRT) rules
- ✓ Cut the Department of Education as a Cabinet-level agency
- ✓ Reverse Biden school loan forgiveness and crack down on loan enforcement
- ✓ Replace secular and public education and democracy with Christian education and schools; redirect public education dollars to private, charter, and Christian schools
- ✓ Promote parental choice for schools

On immigration:

- ✓ Create a stand-alone border and immigration department with 100,000 employees and expanded powers by consolidating the Immigration and Customs Enforcement (ICE)



Stop the Coup 2025

a public education and mobilization campaign

agency, Customs and Border Protection (CBP), and smaller agencies with immigration tasks

- ✓ Seal the border and use military to enforce DHS for domestic border security
- ✓ Focus on security and law enforcement, including detention and deportation, as priorities
- ✓ Arrest, detain and expel tens of thousands of undocumented immigrants, and establish large tent ICE facilities capable of housing 100,000 detainees
 - Reinstall the Remain in Mexico policy as a ‘Day One’ priority
- ✓ Remove ‘credible fear’ and fear of gang violence as grounds for asylum
- ✓ End chain migration while focusing “on the nuclear family”
 - End T and U visas, cut down H2-b visas, crack down on DACA

On free speech and media:

- ✓ Consider limiting mainstream media access to White House press conferences
- ✓ Fight against technology companies seen as promoting liberal values, targeting youth
- ✓ Completely rehaul – or, if not possible, then eliminate -- the US Agency for Global Media, including Voice of America, Radio Free Europe/Radio Liberty to assure pro-America coverage
- ✓ Via presidential pressure, remove federal funding for the Corporation for Public Broadcasting, impacting NPR, Pacifica Radio, to reduce mainstream and “left” coverage
- ✓ Have the president instruct the FCC to exclude PBS and NPR stations.
- ✓ Remove the noncommercial education (NCE) status of PBS, NPR (and Pacifica Radio and their ‘left of the dial’ FM access to lower-frequency broadcasting with a longer reach. This will then require them to pay regulatory fees for which they are now exempt as NCE stations.

Environmental and Agriculture

- ✓ Remove Biden ‘Climate Smart’ and other climate change policies, and challenge the accepted scientific position on the effect of human activities on the climate
- ✓ Decrease enforcement of environmental regulations and loosen if they make it harder to do business
- ✓ Via Executive Order, reverse Biden administration regulations on food and animal safety, and remove safety rules for large-scale farming
- ✓ Restore prior Trump Executive Order to promote timber sales, forest clearing



Stop the Coup 2025
a public education and mobilization campaign

PROJECT 2025 TABLE OF CONTENTS

Title: *Project 2025. Mandate for Leadership - The Conservative Promise*

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Writers: Different conservative thinkers, scholars, for each chapter.

Co-Editors: Paul Dans and Steven Groves at The Heritage Foundation

Acknowledgements

- The Project 2025 Advisory Board
- Table of Contents

Introduction - Notes on Project 2025

- Authors (*with main author bios*) | Contributors (*list*)

Foreword: A Promise to America

Section 1: Taking the Reins of Government

1. White House 2. Executive Office of US 3. Central Personnel Agencies – Managing the Bureaucracy

Section 2: The Common Defense

4. Department of Defense 5. Department of Homeland Security 6. Department of State 7. Intelligence Communities 8. Media Agencies | US Agencies for Global Media | Corporation for Public Broadcasting 9. Agency for International Development

Section 3: The General Welfare

10. Department of Agriculture 11. Department of Education 12. Department Energy and Related Commissions 13. Environmental Protection Agency 14. Department of Health and Human Services 15. Department of Housing and Urban Development 16. Department of the Interior 17. Department of Justice 18. Department of Labor and Related Agencies 19. Department of Transportation 20. Department of Veteran Affairs

Section 4: The Economy

21. Department of Commerce 22. Department of the Treasury 23. Export-Import Bank | The Export-Import Bank Should Be Abolished | The Case for the Export-Import 24. Federal Reserve 25. Small Business Administration 26. Trade | The Case for Fair Trade | The Case for Free Trade

Section 5. Independent Regulatory Agencies

27. Financial Regulatory Agencies | Securities and Exchange Commission and Related Agencies | Financial Protection Bureau 28. Federal Communications Commission 29. Federal Election Commission 30. Federal Trade Commission

Afterword: Onward!



Stop the Coup 2025
a public education and mobilization campaign

SECTION I. TAKING THE REINS OF GOVERNMENT

This section argues for the president to fill his government with political appointees, arguing that Trump failed to fill enough appointees when he was president. “Empowering political appointees across the Administration is crucial to a president’s success,” state the authors. So is removal of any persons not loyal to the conservative cause. “The next Administration must not cede such authority to non-partisan ‘experts,’ who pursue their own ends while engaging in groupthink, insulated from American voters,” states Project 2025.

CHAPTER 1. WHITE HOUSE OFFICE. *Author Rick Dearborn former Deputy Chief of Staff for President Trump; White House Chief of Staff for Legislative, Intergovernmental Affairs and Implementation; with noted input from Edwin Meese III, Donald Devine, Ambassador Andrew Bremberg, and Jonathan Bronitsky.*

Dearborn focuses on the critical role of a Chief of Staff who is tasked with managing both the staffs of the White House Office (WHO) and the Executive Office of the President (EOP). Dearborn lays out the chain of command of the White House Office and its three policy councils: the National Economic Council (NEC), Domestic Policy Council (DPC), and National Security Council (NSC), as well as advisory bodies, reviewing their responsibilities. Dearborn stresses the importance of assuring these positions reflects the president’s agenda -- in this case, Project 2025’s political agenda.

Dearborn focuses on the importance of selecting the right person for the White House Counsel’s office, someone who is more of an “activist,” than white-shoe firm lawyer, armed with legal skills and advice to guide the president and the White House in possibly uncharted legal waters, “including recommendations for reconsidering or reversing positions of the previous Administration in any significant litigation,” he writes. He favors a possible change of the present system to allow outside legal firms to provide help to the White House and president, beyond the current closed decision-making channel between the White House Counsel and Attorney General or Deputy Attorney.

Dearborn stresses the importance of loyalists in positions of Staff Secretary, and Office of Communications, and indirectly calls for changing, and limiting, access of the mainstream media to the White House in a new conservative administration, arguing, “The new Administration should examine the nature of the relationship between itself and the White House Correspondents Association and consider whether an alternative coordinating body might be more suitable.” Under Trump, conservative media outlets were often privileged over mainstream ones at White House press conferences.

Dearborn reiterates the necessity of recruiting and vetting dedicated conservatives to staff offices that are responsible for filling approximate 1000 appointments that require Senate



Stop the Coup 2025
a public education and mobilization campaign

confirmation, and 3000 other political jobs. He notes that the PPO staffs over 100 positions during a presidential transition and thousands of noncareer positions during the president's first term. The same focus on ideologically trained staffers applies to the White House Policy Councils that coordinate the development of Administration policy.

STC 2025 Commentary: In Chapter 1, Dearborn makes clearer how a new administration would legally pursue the expansion of the presidency – a step toward autocracy -- by selecting an experienced conservative “activist” White House Counsel, backed by a loyalist legal team, and changing current chains of command and channels of communication to allow non-governmental conservative legal advisors to shape the administration's legal defense.

Dearborn's implicit call to revamp White House press access reveals a future strategy of favoring partisan conservative media and sidelining mainstream media, to shape public information in favor of conservative views and policies.

Chapter 1 - Key Points:

- ✓ Put an “activist” conservative White House Counsel in place
- ✓ Invite outside conservative legal advice to White House Office
- ✓ Consider limiting mainstream press access to the White House

CHAPTER 2. EXECUTIVE OFFICE OF THE VICE-PRESIDENT. Author: Russ Vought, former Director of the Office of Management and Budget under Trump; Founder and President, Center for Renewing America; with input from almost 30 other conservatives.

Vought focuses on “the existential need for aggressive use of the vast powers of the executive branch to return power, by focusing on the untapped statutory powers of the OMB, within the Executive Office of the President (EOP). The OMB controls “many statutory and executive procedural levers to bring the bureaucracy in line with all budgetary, regulatory, and management decisions,” Vought writes. The OMB develops and enforces the president's budget, manages agency personnel and performance, develops and oversees regulatory agenda, actions and federal information policy, and coordinates communication with Congress of testimonies and views on draft legislation. Most importantly, Vought argues, “*it has the only statutory tools in the White House that are powerful enough to override implementing agencies' bureaucracies.*”

Among actions, Vought calls for putting OMB Program Associate Directors (PADs) who manage six vast Resource Management Offices (RMOs) personally in charge of ‘apportionments’ – installments of allotted budgets for offices of National Security; Natural Resources, Energy, and Science; Health; Education, Income Maintenance, and Labor; Transportation, Justice, and Homeland Security; Treasury, Commerce, and Housing. Vought suggests creating a new layer of deputy PADS to replace career professionals who help manage the money within the big RMOs.



Stop the Coup 2025
a public education and mobilization campaign

Vought also calls for a strong and creative legal White House Counsel ready to battle other government departments who may disagree with the president's actions "based on the mere assertion (and not proof) that the law disallows it or that, conversely, attempt to disregard the clear statutory commands of Congress." He also discusses myriad steps to bring regulatory agencies and actions in line with conservative goals, including creation of "regulatory advance teams" primed to consult with agencies.

At specific agencies like the National Security Council, Vought calls for replacing directors/directorates not deemed sufficiently in line with the conservative agenda, and, on day one of 2025, sending home all non-essential NSA employees. He also wants the NSC to have its own lawyer, and be fully incorporated into the White House, not answerable to other offices. At the National Economic Council, he would put the NEC in charge of coordinating all internal economic policy, working closely with the Council of Economic Advisers.

At the Office of the US Trade Representative, Vought focuses on an empowered USTA that can battle China and globalization to assure US trade policies reflect conservative goals. Elsewhere, Vought calls for an Executive Order to reshape the US Global Change Research Program (USGCRP) and related climate change research, as well as sweeping changes to reduce the "litigation risk." States Vought: "...the Biden Administration's climate fanaticism will need a whole-of-government unwinding."

Vought devotes special attention to the **Gender Policy Council**, calling for its elimination, along with any guidance documents it promoted. States Vought: "*Abolishing the Gender Policy Council would eliminate central promotion of abortion ("health services"); comprehensive sexuality education ("education"); and the new woke gender ideology, which has as a principal tenet "gender affirming care" and "sex-change" surgeries on minors.*" He suggests naming a Special Assistant to the President to lead promotion of domestic policy on life and family in line with conservative values, working with the Domestic Policy Council.

STC 2025 Commentary: Vought is focused on weaponizing the OMB to assure the president's supporters control the budget and purse strings of government in key sectors, while removing career officials who might object. He anticipates inter-governmental battles over the legality of the next presidential actions by stressing the need for a bold, legally "creative" White House Counsel. That includes efforts to reverse climate change progress under Biden.

By eliminating the Gender Policy Council, Vought would end all discussion and government protection related to gender and LGBTQ+ identity, with a special focus on blocking care for transgender individuals, and access to reproductive health services, including abortion.

Chapter 2 - Key Points:

- ✓ Flex the untapped statutory powers of the OMB to control funding of offices
- ✓ Put OMB Program Associate Directors who are conservative loyalists in charge of vast Resource Management Offices, and replace career officials with new deputy PADs.
- ✓ Make the National Security Council a part of the White House, unaccountable to other offices



Stop the Coup 2025

a public education and mobilization campaign

- ✓ Seek to completely reverse Biden administration climate change policies
- ✓ Eliminate the Gender Policy Council and end all federal discussion or support for gender and LGBTQ+ identity, transgender care, and reproductive health, including abortion

CHAPTER 3. CENTRAL PERSONNEL AGENCIES: MANAGING THE BUREAUCRACY.

Authors: Donald Devine, Dennis Dean Kirk, Paul Dans, *with major DHS input.* Devine is an author and Senior Scholar at The Fund for American Studies in Washington, DC, and served in the Office of Personnel Management under Reagan. Kirk is Associate Director of Personnel Policy with the Heritage Fund's Project 2025, and served in senior positions in the Trump and George Bush administration.

This chapter emphasizes the conservative mantra “personnel is policy” that the authors state is the fundamental principle guiding the government’s personnel management. They discuss needed changes at the four key personnel agencies of the government: The Office of Personnel Management (OPM); The Merit Systems Protection Board (MSPB); The Federal Labor Relations Authority (FLRA); and The Office of Special Counsel (OSC). The MSPB is the main regulator of cases of some 2.2 federal employees, while another agency, the General Services Administration (GSA), manages federal contracts.

The authors focus on the need to implement merit-based performance evaluations of employees to address what they view as a glut of federal workers who are given high performance and salaries but provide poor performance. They raise the issue of managers being accused of racial or sexual discrimination when they give employees low performance rating, a barrier to firing workers who don’t do their jobs well. They call for reinstating a Trump-administration Executive Order 13839 to crack down on employee performance that the Biden administration overturned.

They also note that, “It is essential that political executives build policy goals directly into employee appraisals both for mission success and for employees to know what is expected” – a tacit threat to fire managers and employees who fail to enact conservative policies. They want to transfer authority to rule in federal employee complaint cases away from the Equal Employment Opportunity Commission and to the MSPB, which would become the main arbiter.

Schedule F: The authors advocates using ‘Schedule F’ to carry out what is essentially the removal of career professionals who are not conservative loyalists from high-level advisory positions into a new “at will” status that strips them of civil service protections. They back applying a private market system of pay for federal employees and retired workers, arguing that their current benefits are too great. They also seek a freeze on hiring of career professionals with subject expertise, and advocates various strategies to cut the federal workforce.

They want to strengthen management authority over organized labor, and restore three Executive Orders Trump passed that Biden reversed (EO’s 13836, 13837, and 13839) -- all



Stop the Coup 2025
a public education and mobilization campaign

designed to limit the power of labor unions representing federal agency workers. They also question “whether public-sector unions are appropriate in the first place.”

They also call for the OPM to work closely with the Presidency and suggest giving the president new “direct supervision of the bureaucracy with the OPM Director available in his Cabinet” to help push through political appointees quickly – an important ideological goal.

STC 2025 Commentary: Project 2025 is focused on strategies to both reduce the size of the federal workforce – a familiar conservative movement goal --and reduce the power and impact on policy of career professionals who may disagree with the conservative agenda.

Here, Schedule F and Trump Executive Orders are to be weaponized to remove and punish career professionals who might otherwise resist the GOPs restructuring agenda. The proposal to give a president the power to decide personnel appointees, advised by a now Cabinet-level OPM – also reflects the goal of removing any obstacles to the GOP’s agenda, beefing up the cadre of loyalists in critical decision-making positions, and limiting Congressional opposition to, and oversight of, conservative nominees.

Overall, Project 2025 makes clear its restructuring personnel plan supports the conservative goal of radically reversing existing government protections for federal workers and favoring private corporate and management rights over union power. If hard-line conservatives could, they would eliminate public sector unions altogether.

Chapter 3 - Key Points:

Personnel:

- ✓ Support merit-based performance evaluations of federal workers
- ✓ Reward managers and employees who implement conservative policies
- ✓ Make MSBP main arbiter of federal personnel dispute cases, not EEOC
- ✓ Use Schedule F to remove career employees and prior administration holdovers
- ✓ Restore Trump-era Executive Orders to boost management rights vs. union power
- ✓ Give president the power to fast-track personnel appointees, with empowered OMB
- ✓ In Coast Guard, and military posts, “re-vet” promotions and hirings during Biden Administration; rehire personnel let go for refusing Covid vaccination, offer back pay
- ✓ Reduce US Secret Service budget; reassign USSS personnel to ICE, Justice, emphasize protection roles
- ✓ Eliminate the Office of Intelligence and Analysis
- ✓ Hire more Schedule C/political legal appointees to Office of General Counsel to assure consistency of legal viewpoints in response to Congressional requests
- ✓ Only political appointees from Office of Legislative Affairs should speak to Congressional staffers; all requests to pass to OLA

Civil Rights:

- ✓ Reduce size, authority of Office for Civil Rights and Civil Liberties;



Stop the Coup 2025
a public education and mobilization campaign

- put it and Privacy Office under Office of General Counsel, eliminate their access to review, advise on intelligence products

Intelligence Community:

- ✓ Cooperate in the shrinking or elimination of the I&A (Intel, Advisory) role in the intelligence community

Immigration:

- ✓ Eliminate both Office of the Immigration Detention Ombudsman (OIDO) and Office of the Citizenship and Immigration Services Ombudsman (CISOMB);
 - issue policy to stop assisting illegal aliens and DACA applicants to obtain benefits
- ✓ Move Office of Refugee Resettlement (ORR) and Dept of Justice Executive Office for Immigration Review and the Office of Immigration Litigation to DHS control, aggressively help to build US southern border wall

Housing:

- ✓ Only US citizens, ‘lawful’ permanent residents can use or live in federally subsidized housing

Education:

- ✓ Deny US loans to non-US citizens, lawful permanent residents, students at schools that provide in-state tuition to illegal aliens

Labor:

- ✓ Eliminate the two (of four) lowest wage levels for foreign workers

Treasury:

- ✓ Equalize taxes between American citizens and working visa holders and quickly provide DHS with all tax information of illegal aliens

SECTION TWO. THE COMMON DEFENSE

CHAPTER 4. DEPARTMENT OF DEFENSE. *Author: Christopher Miller. A former Green Beret, Miller has served in several Trump Administration senior positions, including Acting US Secretary of Defense and Director of National Counter-Terrorism Center, among others.*

In his overview of the deep problems plaguing today’s military and Department of Defense, Miller cites a “two-tiered” culture of command that shields top officers from accountability while harming lower-level officers and field soldiers, along with wasteful spending, sifting security policies, poor program execution. He also blames the Biden administration for “a profoundly unserious equity agenda and vaccine mandates” that has hurt the military.

He calls for a refocus on warfighting, reestablishing a culture of command accountability and the “non-politicization” of the DOD, plus increased DID support to the Department of Homeland Security (DHS) for border protection operations – a national security issue.



Stop the Coup 2025
a public education and mobilization campaign

The US must act to limit China and its nuclear military capability by supporting a “denial defense” of Taiwan to counter Beijing’s domination of Taiwan and Asia. Russia, Iran and North Korea and transnational terrorism in the Middle East are the top threats to American interests. Miller’s proposal calls for calling upon US allies, and helping to boost their capacity to defend themselves.

Proposals:

- ✓ Against Russia, US NATO allies should shoulder the burden of conventional warfare, limiting the US to a “nuclear deterrent” role.
- ✓ Taiwan and Asian regional allies, with Australia, should create a collective defense model.
- ✓ In the Middle East, the US should continue supporting Israel while pushing Gulf allies to patrol their own airspace and control their own missile defenses.
- ✓ Importantly, the US must heavily invest to modernize its nuclear military capacity, since China and Russia are doing that. The US must avoid any threat of nuclear coercion, he argues.

Among reforms, Miller emphasizes a need to invest in new technologies needed “to fight and win wars, and support purchase of American-made products and those of allies. He proposes designing a system to purchase new or experimental systems without breaking the law but avoiding DOD regulatory red tape. He also pushes for restoring America’s status as the leading seller of “the arsenal of democracy;” boosting foreign military sales is a major conservative goal. To help achieve this goal, he calls for eliminating Congressional tiered review of prospective arms deals apart from times when unanimous Congressional support is guaranteed.

Miller seeks to transform military training and culture, arguing, “The Army can no longer serve as the nation’s social testing ground.”

Proposals include:

- ✓ Increase recruitment to the military with, among steps, placing ROTC in secondary schools
- ✓ Expel individuals with “gender dysphoria” (transgender individuals)
- ✓ Cut “any public monies for transgender surgeries, or to facilitate abortion for servicemembers”
- ✓ eliminate “Marxist indoctrination and divisive critical race theory programs” as well as “newly established diversity, equity, and inclusion offices and staff”
- ✓ Monitor military schools to remove “Marxist indoctrination;” eliminating tenure for academics deemed too liberal/left

Other major proposals:

- ✓ Force Design 2030, labeled “the most radical transformation of the Marine Corps since World War II”
- ✓ Adopt “irregular warfare” as a cornerstone of US military strategy and using this domestically as well as abroad



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- ✓ In a major departure, changing historic US missile defense policy from ‘only deterrence’ to new adoption and investment in offensive missile defense
- ✓ In space defense, reverse the Biden administration’s current policy, which is deemed “limited to defense,” (deterrence) to provide offensive capabilities.
- ✓ Invest in the US CyberCom system as a critical priority
 - end CyberCom’s participation in federal efforts to “fortify” elections “to eliminate the perception that DOD is engaging in partisan politics”

STC 2025 Commentary: Miller presents an established conservative US isolationist approach to war but calls for a radical and alarming changes to DOD policy. He advocates adopting “irregular warfare” as a cornerstone of US military strategy.

In a dangerous shift, he also proposes reversing the historic US position of deterrence in missile and space defense systems. He also suggests sidestepping Congressional oversight to purchase new or experimental weapons systems, testing the legal limits of DOD to do so. All are aggressive steps.

The call to expel transgender servicemembers and eliminate funding for gender surgery or abortion is in line with Project 2025’s larger culture war and anti-gender agenda, as is the elimination of DEI policies and curricula, and threat to fire leftist scholars.

Chapter 4 - Key Points:

- ✓ Refocus the DOD on war fighting, chain of command accountability
- ✓ Adopt “irregular warfare” as a cornerstone of US military strategy abroad
- ✓ Design a system to purchase new or experimental weapons systems without breaking the law but avoiding DOD regulatory red tape; boost US military sales.
- ✓ Increase DOD support to DHS for domestic border security
- ✓ Limit China and its nuclear military capability by supporting a Taiwan “denial defense”
- ✓ In a major step, reverse the historic US policy of deterrence-only to invest and adopt an offensive missile defense policy and a space defense policy
- ✓ Support allies to engage in, and shoulder, the burden of conventional warfare
- ✓ Enact a radical transformation of the Marine Corps, Force Design 2030
- ✓ Expel individuals with “gender dysphoria” (transgender), cut public funding for transgender surgery or to facilitate abortion for servicemembers
- ✓ Counter DOD diversity initiatives: eliminate “Marxist indoctrination and divisive critical race theory programs” and diversity, equity, and inclusion (DEI) offices and staff
- ✓ Monitor military schools to remove “Marxist indoctrination;” eliminate tenure for leftist scholars
- ✓ Invest in US CyberCom



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CHAPTER 5. DEPARTMENT OF HOMELAND SECURITY Author: Ken Cucinelli, former Acting Director of US Citizenship and Immigration Services under Trump; Acting Deputy Secretary for the Department of Homeland Security (DHS); with DHS experts.

Cucinelli’s priority recommendation is to eliminate the Department of Homeland Security and all current members of the Homeland Security Advisory Committee. This is to address DHS’s failure to become a single “One DHS”; its various missions are disjointed vs. cohesive, Cucinelli states. Conservatives back transferring DHS missions to other agencies into one “stand-alone” agency – to become the third largest in government, in term of personnel. The priorities of homeland security should be refocused on law enforcement, they argue.

Conservatives seek to crack down on border control; halt the expansion of immigration and asylum programs; and arrest, temporarily detain, and expel large numbers of undocumented aliens and recent arrivals who have not secured citizenship.

Proposals:

- ✓ Create a stand-alone border and immigration agency at the Cabinet level – becoming the third largest federal department with over 100,000 employees -- by combining the US Customs and Border Protection (CBP) with Immigration and Customs Enforcement (ICE), the US Citizenship and Immigration Services (USCIS), the Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR), the Department of Justice (DOJ) Executive Office for Immigration Review (EOIR), and the Office of Immigration Litigation (OIL)
- ✓ Move the Cybersecurity and Infrastructure Security Agency (CISA) to the Department of Transportation
- ✓ Move the Federal Emergency Management Agency (FEMA) to the Department of the Interior or, if combined with CISA, to the Department of Transportation
- ✓ Move the US Coast Guard (USCG) to the Department of Justice and -- in time of full-scale war -- to the Department of Defense (DOD). Alternatively, move the Coast Guard to DOD for all purposes
- ✓ Split the US Secret Service (USSS) in two: move the protective element to the Department of Justice and move financial enforcement to Treasury
- ✓ Privatize the Transportation Security Administration (TSA)
- ✓ Move the Science and Technology Directorate (S&T) to the DOD
- ✓ Move the Office of Countering Weapons of Mass Destruction to the FBI
- ✓ Cut all remaining elements of DHS to save taxpayers’ money

The dismantling and redirection of Homeland Security mission would address what Cucinelli calls “its drift” under Biden to a “woke” Left. *The proposed DHS reshuffle would:*

- ✓ Prioritize border security and immigration enforcement, including detention and deportation



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- ✓ Repair the “historic damage done by the Biden Administration,” and establish a lawful, orderly immigration system that would protect the homeland from public safety threats

Novel “Day One” strategy: Cucinelli calls for empowering the Office of the Secretary to carry out the DHS agency reorganization, and proposes a novel “Day One” 2025 strategy to assure loyalists in key agency seats.

This calls for vetting of candidates by the Office of Presidential Personnel, “which is not reliant on detailees from other parts of the department, to help ensure the completion of the next president’s agenda.”

While acknowledging the constitutional requirement of Senate confirmation of nominees, Cucinelli suggests “a novel approach” to fast-track confirmations of nominees to avoid Senate delay that involves placing conservative nominees into “acting” or interim positions while they await Senate approval. This step would “guarantee implementation of the Day One agenda and equip the department for potential emergency situations while still honoring the confirmation requirement,” writes Cucinelli.

Proposals:

- ✓ New legislation “to establish a more durable but politically oriented line of succession for agency decision-making purposes”
 - in cases where career officers are in a position, hold that seat for a loyalist
 - redistribute DHS employees, and transfer all law enforcement capacity in office billets to field positions “to maximize law enforcement capacity”
- ✓ Give explicit decision-making powers to individuals wielding “acting” Secretary authority to finalize agency actions, including regulations, to ensure fulfillment of department’s homeland security mission

Customs and Border Patrol (CBP):

- ✓ Expand CBP arrest and detention capacities
- ✓ Bring back horseback-mounted Border Patrol, and “clear the records and personnel files of those who were falsely accused by Secretary Alejandro Mayorkas of whipping migrants and issue a formal apology on behalf of DHS and CBP”
- ✓ Fund and expand border wall and Port of Entry sites

Detention:

- ✓ Put into law a single nationwide detention standard to overcome having to adhere to varying state standards and oversight; this would “allow the flexibility to use large numbers of temporary facilities such as tents”
- ✓ Congress should mandate and fund more tents and beds for 100,000 illegal aliens
- ✓ Congress should fund 20,000 Expedited Removal Officers (ERO) and 5,000 attorneys at the Office of the Principal Legal Advisor (OPLA)

ICE:



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- ✓ Direct ICE to take custody of all aliens with records for felonies, crimes of violence, DUIs, previous removals, and any other crime considered a national security or public safety threat under current laws
- ✓ Eliminate T and U visas
- ✓ Cap H-2B (seasonal non-agricultural) visas and avoid issuing any regulations that would favor certain foreign nationals seeking an H-2 guest worker visa
- ✓ Take executive action to eliminate visas for foreign students “from enemy nations”
- ✓ Give ICE authority to arrest, detain, and remove “immigration violators” anywhere; eliminate “sensitive zones” where ICE now can’t operate
- ✓ Next administration should challenge current ICE limits of “expedited removal” of “eligible aliens” to within 100 miles of the US border. “This is not a statutory requirement,” states Cucinelli
- ✓ Expand the use of workplace search warrants (Blackies Warrants) to allow ICE to question or apprehend workers ICE suspects of being undocumented immigrants

USCIS:

- ✓ Limit USCIS to a screening and vetting agency, not to speed up immigration, but crack down
- ✓ Move away from expanded-access and temporary patrol programs “that are contrary to Congressional intent”
- ✓ Crack down on prosecution of possible citizenship fraud cases and create a criminal investigation team to investigate possible immigration benefits fraud of Title 8 cases
- ✓ Refocus USCIS on law enforcement and eliminate transfer of USCIS officers to work with “DACA, mass parole for Afghans, Ukrainians, Venezuelans, etc.”

Additional proposals:

- ✓ End chain migration while focusing “on the nuclear family”
- ✓ End the current employment visa program to reward only “best and brightest.” Transform the current H1-B visa program into an elite program
- ✓ Require all visa applicants rejected for any benefit or status adjudication to immediately leave the US
- ✓ Remove “credible fear” and fear of gang violence as grounds for asylum
- ✓ Repeal immigration benefits for unaccompanied children
- ✓ Remove alien children from HHS jurisdiction
- ✓ Amend Section 235 of the Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA) to more easily return unaccompanied children to home countries
- ✓ Set new national standards for large-scale temporary tents to house undocumented families
- ✓ End funds to nongovernmental organizations (NGOs) to process and transport illegal aliens into and throughout the United States
- ✓ Set stricter limits of employment for legal immigrants and non-immigrants



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- ✓ Restart the Remain in Mexico Protocol, working to keep asylum seekers and other immigrants from entering the US
- ✓ With presidential approval, refuse to allow mass migration of groups of aliens

FEMA

- ✓ Transfer control of FEMA grants to states
- ✓ Privatize and/or end the National Flood Insurance Program (NFIP)
- ✓ Cut needed FEMA Senate-confirmed positions to one – the Administrator
- ✓ Eliminate FEMA’s “springing Cabinet position” to support coordinated agency responses

CISA

- ✓ Realign CISA with the government’s priorities
- ✓ End current “censorship of misinformation and disinformation” that began after alleged Russian misinformation in the 2016 election. (“That turned out to be a Clinton campaign ‘dirty trick,’” says Cucinelli)
- ✓ Fire CISA Cybersecurity Advisory Committee on Day One (Jan. 20, 2025)
- ✓ Move CISA’s emergency communications and Chemical Facility Anti-Terrorism Standards (CFATS) roles to FEMA
- ✓ Move CISA’s school security functions to state homeland security offices
 - CISA should not duplicate cybersecurity functions done elsewhere (DOD, FBI, NSA, USSS)
- ✓ For election security/preparation, CISA should help states and localities assess if they have “good cyber hygiene” in their hardware and software -- but nothing more
 - CISA should *not* be significantly involved closer to an election, nor participate in messaging or propaganda

Coast Guard:

- ✓ USCG’s budget should reflect mission activities
- ✓ Counter China’s influence and encroachment in the Pacific region (a conservative priority)
- ✓ Fund Pacific wartime drills
- ✓ As with DOD, re-onboard USCG personnel dismissed from service for refusing to take the COVID-19 “vaccine,” with time in service credited to them

Monitoring Speech: Cucinelli focuses special attention on the role of the Office of Strategy, Policy, and Plans (PLCY), calling for “a complete inventory, analysis, and reevaluation of the department’s domestic terrorism lines of effort to ensure that they are consistent with the president’s priorities, Congressional authorization, and Americans’ constitutional rights.”

Steps:



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- ✓ Evaluate, with the help of social media outlets, any efforts “to censor or otherwise change or affect Americans’ speech” and to “comprehensively report on and publish this history in full so that the American people can know the facts”
 - The PLCY should fire all personnel who participated in such activity

Intelligence and Analysis:

- ✓ Eliminate The Office of Intelligence and Analysis, “because it has not added value and because it has been weaponized for domestic political purposes”

Other Proposals:

- ✓ Execute the major reorganization of homeland security structure and chain of command, by calling on the Office of General Counsel to “advise principals as to how DHS can execute its missions within the law instead of advising principals as to why they cannot execute regulations, policies, and programs”
 - This step calls for hiring significantly more Schedule C/political appointees to supervise career staff and manage their output
- ✓ Among radical steps, reduce the scope and function of the Office of Civil Rights (CRCL) and the Privacy Office (PRIV) to a single officer, with a narrow task of reviewing alleged abuses to civil rights
 - Put CRCL and PRIV employees under the control of an OPC Deputy General Counsel -- a political appointee

STC 2025 Commentary: Cucinelli lays out a militarized homeland security plan with a focus on reducing immigration and expelling large numbers of undocumented immigrants with pending applications, and using “irregular warfare” to increase militarization of surveillance of domestic groups viewed as not aligned with the president’s actions, policies, or larger conservative agenda. This, coupled with steps to reduce the Office of Civil Rights, are in line with Project 2025’s embrace of authoritarian rule under a president with expanded powers, backed by a corps of activist lawyers.

The proposed Day One “novel approach” of immediately placing unvetted conservative loyalists into “acting” or temporary high-level seats of Homeland Security offices on Day One reveals Project 2025’s creative attempt to gain conservative control of decision-making and sidestep Senate oversight. Whether it is legal is secondary to this untested strategy. While Cucinelli does not specify if such temporary “acting” appointees would also have “final authority” to make decisions while waiting for Senate hearings and approval, that appears to be his intention.

Here, Project 2025 makes clear its brazen attempt to override the existing Congressional oversight mechanisms to seat loyalists in critical Homeland Security positions and authorize them – however temporarily – to act with unfettered authority. This is how they plan to “dismantle the Administrative State” and rewrite the rules of governance and department policy – from Day One to Day 180 – or the day a Congressional hearing stops them.



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Chapter 5 - Key Points

- ✓ Eliminate the Department of Homeland Security and create a super agency with 100,000-strong work force focused on law enforcement domestically, while limiting Office of Civil Rights role
- ✓ Drastically expand ICE's mandate to arrest, detain, and expel undocumented immigrants
- ✓ Direct the Office of General Counsel to help make reforms legal or defend challenges to reforms
- ✓ Apply "irregular warfare" to create a militarized domestic surveillance corps against individuals or groups at odds with presidential / Project 2025 conservative agenda
- ✓ Use a novel approach to immediately place loyalists in temporary "acting" positions with unquestioned authority to decide policy -- while sidestepping Congressional oversight

CHAPTER 6. DEPARTMENT OF STATE. Author: Kiron K. Skinner, *President and CEO of the Foundation for America and the World; former Director of Policy Planning and Senior Advisor, Department of State; Visiting Fellow and Senior Advisor, The Heritage Foundation; with help from 17 named individuals and The Heritage Foundation staff.*

Skinner says that as the main department tasked with carrying out US foreign policy, the State Department has always been plagued by career officers with a Left agenda who cripple its effectiveness, especially for conservative presidents. To correct this, Skinner calls for the president to directly place senior-level political appointees in the State Department that do not require Senate confirmation, and to increase the number of political appointees. The president-elect's transition team or the new, planned, President's Office of Presidential Personnel will select all non-confirmed senior appointees and be in place on Day One of the new administration, making sure no Biden administration appointees remain in office, even for a transition, if possible.

Here, Skinner calls for maintaining career civil servants "leveraged for their expertise and commitment to the president's mission," noting, "they need not be adversaries of a conservative president." But they need to align with the president's mission, including diplomats. He calls for:

- ✓ Political ambassadors with close relationships to the president for priority strategic posts in Australia, Japan, the United Kingdom, the United Nations, and the North Atlantic Treaty Organization (NATO)
- ✓ A retroactive freeze, review, and recalibration of existing treaties and agreements to realign them with the president's foreign policy agenda, and revoking of the C-175 (Circular 175 procedures) international treaty-making authority given to other agencies by earlier administrations
- ✓ Support for the new Office of China Coordination, or "China House," staffed by appointees, to lead the diplomatic conservative "war" against the Chinese Communist Party



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- ✓ Review, refocus the State Department on its handling of immigration and domestic security issues, increasing use of visa reciprocity (withholding, approving) as a lever of diplomacy
- ✓ Review all “removal-pending nationals” to expedite their eviction from the US
- ✓ Indefinitely curtail the State Dept.’s US Refugee Admission Program (USRAP)
- ✓ Reimplement the Remain in Mexico policy as a Day One priority
- ✓ Review the Diversity Visa program, the F (student) visa, and J (exchange visitor) visa programs to assure they align with White House immigration policy, national security, and resource limitations
- ✓ Significantly reorient the president’s posture toward “friends and enemies alike”
- ✓ Focus on China, Iran, Venezuela, Russia, and North Korea as foreign policy priorities
- ✓ Develop an Article X for China by presidential mandate – a call for a deep philosophical look at the challenge posed by China – and reverse Biden’s position on Iran
- ✓ While acknowledging differing opinions on the Ukraine-Russia war, the next government must chart a course that aligns with American interests, while “all sides agree that Putin’s invasion of Ukraine is unjust and that the Ukrainian people have a right to defend their homeland”
- ✓ In the Middle East, defund the Palestinian Authority
- ✓ The US must work to block North Korea from becoming a de facto nuclear power
- ✓ The US must work for a “fentanyl-free frontier” on the southern border and act against drug cartels
- ✓ In Africa, shift from humanitarian aid to fostering free-market systems and reject promotion of divisive social policies such as abortion or pro-LGBT being imposed on them
- ✓ The US must focus on the Arctic, and NATO must develop and implement an Arctic strategy to ensure that Russian use of Arctic waters and resources does not exceed a reasonable footprint
- ✓ Regarding international organizations, including the UN, the US must be prepared to take appropriate steps in response, up to and including withdrawal, if they act against US interests
- ✓ Direct the State Department to do a cost-benefit analysis of US participation in all international organizations, following the view that international organizations “should not be used to promote radical social policies as if they were human rights priorities”
- ✓ The US cannot support funding for international programs that fund or support abortion
- ✓ Consider restrictions of federal funding for WHO and health-related organizations whose policies don’t align with the administration’s
- ✓ Make public broadcasting reflect the administration’s agenda
- ✓ In arena of cyber space, State Department should assist DOD to go “on offence” against adversaries

STC 2025 Commentary: Skinner’s proposal to immediately replace Biden foreign service officials in key decision-making positions with loyalist appointees is designed to assure



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the next administration makes major policy decisions as fast as possible, avoiding Congressional opposition. His proposal for a “novel approach” to seating nominees in “acting” positions of authority on Day One is a bold attempt to sidestep Senate oversight in the very first days of the new presidency, since it takes longer for Senate hearings to happen. The legality of such a move is not established, but is sure to be fought by progressives, especially for high-level positions that require prior Senate approval.

The priority foreign policy focus on Iran, China, North Korea, and Venezuela is a conservative staple, too. It reflects conservative views of the threat of Communism and Venezuela’s socialist regime. So is the call to stop funding international organizations that fund abortion or progressive social policies; it reflects Project 2025’s goal of promoting hardline Christian conservative views in foreign policy as in domestic policy.

Chapter 6 - Key Points

- ✓ Remove all Biden officials and immediately place conservative loyalists in key decision-making positions via a novel strategy of appointing them in “acting,” or temporary positions, with possibly decision-making authority, even as they await Senate approval
 - Increase the number of loyalists in foreign policy positions
 - In foreign policy, leverage career diplomats who align with conservative agenda
- ✓ Freeze and/or review all existing international treaties to assure they align with presidential agenda and foreign policy priorities
- ✓ Focus foreign policy on Iran, Venezuela, Russia, North Korea, and China; develop an Article X review of China policy and reverse Biden’s Iran policy
- ✓ Cut funding to international organizations that fund abortion or social policies that are viewed as counter to conservative values, including the WHO

CHAPTER 7. INTELLIGENCE COMMUNITY. *Author: Dustin J. Carmack, former Chief of Staff to the Director of National Intelligence; Research Fellow for Cybersecurity, Intelligence, and Emerging Technologies in the Border Security and Immigration Center at The Heritage Foundation; with collective input from the 2025 Presidential Transition Project.*

The Intelligence Community (IC) is composed of 18 independent and Cabinet subagencies that monitor and assess intelligence and engage in counterterrorism -- i.e., spydom. Here, the Office of the Director of National Intelligence (ODNI) was set up post 9/11 by the Bush administration in 2004 as a small coordinating agency of the IC with a Cabinet-level intelligence officer. However, Carmack argues, there are historic interagency rivalries and chain of command conflicts, including with the Central Intelligence Agency (CIA), that plague the IC. The author calls for the president to strengthen the role and authority of ODNI to make decisions. They call on future IC leadership to address the “woke” politics of “identity politics” and “social justice.”

One conservative priority is domestic terrorism. The authors call for the next president to:



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Steps:

- ✓ Modify Executive Order 12333, the president's direction for implementing the Intelligence Reform and Terrorism Prevention Act of 1004 (IRTPA). This legislation defines how sharing of terrorism information must adhere to legal standards relating to privacy and civil liberties
 - An IRTPA revision should address cyber communications among key US agencies, bioweapons threats, evaluation of open-source information, and make use of security clearances to support the president's agenda
- ✓ Increase the power of the IC via Executive Order or suggested changes in the Counterintelligence Enhancement Act (CEA) of 2002
- ✓ At the CIA, the president-elect should choose a deputy director who, without requiring Senate confirmation, can immediately begin to implement the president's agenda. He should prevent "burrowing in" of outgoing Biden CIA officials and hire more loyalists
- ✓ The new CIA Director should remove resources from any agency activities that promote "divisive cultural agendas" and "unnecessary and distracting social engineering" – references to gender and diversity reforms
- ✓ Refocus the CIA to an OSS-like culture that rewards applicants who take high-risk assignments
- ✓ Place experts in covert action in key NSC, CIA, ODNI, and DOD positions to consider expansion of covert action, for example, outside circumstances of armed conflict
- ✓ Remove IC employees who abuse their positions of trust – failing to align with the president and agency's intelligence mission
- ✓ Investigate past politicization and abuses of intelligence information by IC employees and crack down on intelligence leaks to press or public
- ✓ Support the IC's ability to seek records of unauthorized disclosures of classified information (whistleblowers) to the media and hire more staff to help on this
- ✓ Review the Foreign Intelligence Surveillance Act (FISA) to assure it serves president's agenda
- ✓ Review China intelligence policy as a priority and the Foreign Agents Registration Act (FARA)
- ✓ Engage corporate America, technology companies, research institutions, and academia to be willing, educated partners in the administration's needs related to intelligence and "not cave to the left-wing activists and investors who ignore the China threat"
- ✓ Amplify the National Counterintelligence and Security Center's authorities and roles
- ✓ Provide the FBI with significant additional resources and legal authorities as the lead operational counterintelligence agency
- ✓ Establish a real-time auditing system for sensitive intelligence across the 18 elements of the IC
- ✓ Transition IC to using more technology, including tools and services for managing Big Data, while keeping human expertise oversight



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- ✓ Update, modernize, and improve resources and training for agents to operate clandestinely
- ✓ The incoming president should request an immediate study of the implementation of Executive Order 14086 and suspend any (EU) provisions that unduly burden intelligence collection

STC 2025 Commentary: The move to modify EO 12333 would expand the next administration's ability to carry out domestic intelligence gathering and surveillance while following possibly looser legal standards relating to American's privacy and civil liberties, especially given Project 2025's stated plans to crack down on illegal immigration and groups perceived as opposing the president's or the conservative movement's agenda.

Overall, Carmack calls for beefing up the US intelligence force and capacity, while streamlining the chain of authority to reduce agency turf wars with the CIA that result in muddled intelligence assessments. They seek more money and training to support (and reward) risk-taking agents and push for adoption of technology and new technology, including Big Data analysis, to improve the IC's work and make it state-of-the-art. They want the US to be less beholden to current rules that stipulate intelligence-sharing with the EU.

Chapter 7 - Key Points

- ✓ Revise the Executive Order related to the Intelligence Reform and Terrorism Prevention Act of 2004 to give the next administration expanded powers to conduct domestic intelligence activities that might infringe on civil liberties and privacy
- ✓ Beef up and expand the intelligence community's activities, including the FBI, and make greater use of technology to modernize and improve the IC's work, especially compared to China
- ✓ Focus on China's Communist Party as a major global threat; prioritize IC focus on China

CHAPTER 8 . MEDIA AGENCIES. US AGENCY FOR GLOBAL MEDIA Author: *Mora Namdar, attorney, and Senior Fellow at the American Foreign Policy Council; former vice-president of the USAGM; former Senior Advisor, Dept. of State; with input from Victoria Coates, Michael Pack, Frank Wuco, "and several brave whistleblowers."*

The mission of the USAGM is to inform, engage, and connect people around the world in support of freedom and democracy, but, Namdar argues, execution is lacking. The USAGM must be reformed top to bottom by the White House and Congress, she recommends. If that's not possible, the media agency should be defunded and shut down. She argues that the USAGM has lost its basic propaganda mission of telling America's story abroad; instead, it too often carries critical views of America.

The USAGM oversees the Voice of America (VOA) and the Office of Cuba Broadcasting (OCB) and 100% of the funding for the Middle East Broadcasting Network (MBN), Radio Free



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Asia (RFA), Radio Free Europe/Radio Liberty (RFE/RL), and the newly formed Open Technology Fund (OTF).

Namdar says the VOA has lost its formerly good reputation by broadcasting “flagrantly political content,” while the OCB has suffered from limited budget and some voices too empathetic to the Cuban Communist regime. Other problems are duplications of content at Radio Free Europe/Radio Liberty, and security risks that have plagued the radio network, while financial corruption has affected Radio Free Asia. Meanwhile, the OTF is deemed wasteful -- “a boondoggle.”

The main critique of the USAGM is poor oversight of journalists who tout anti-American propaganda by giving voice to critics, versus their mission of promoting American propaganda. Another is the Biden administration’s reversal of personnel decisions made by Trump. Namdar asserts that former and current USAGM/VOA leadership engaged in “near-daily” attacks on the efforts of the Trump administration and its appointees to carry out reforms of these institutions. USAGM higher ups sided with mainstream media organizations’ “anti-US chorus and denigrating the American story—all in the name of so-called journalistic independence.” The USAGM is also vulnerable to exploitation by foreign spies, Namdar charges, and too many personnel are not properly vetted for security clearances.

Other criticisms:

- ✓ The US has invested in web-based technologies, overlooking durable and valuable non-web technologies such as shortwave radio transmission stations that can serve where Internet access is limited. Plus, undersea cables (internet) are vulnerable to damage, especially during major conflict
- ✓ The USAGM should report to the president and be overseen by the National Security Council, but lacks such supervision
- ✓ The VOA should be put under the NSC’s oversight, or in the Office of Global Public Affairs at the Department of State, an agency created under the Trump administration
- ✓ The Smith–Mundt Act stipulates that USAGM services are meant to tell the American story abroad only, but the agency used its taxpayer funding to promote pro-Biden partisan messaging domestically

Namdar advocates for a complete overhaul of the USAGM, including reforms to address the points above, with help from (conservative) industry groups, nonprofits, trade associations, foundations, and activist organizations, for example, America First Legal Foundation, USAGM Watch, BBG-USAGM Watch, and Whistleblower Protection Project.

Corporation for Public Broadcasting: Federal funding should be cut from PBS due to its liberal bias, contends Namdar, writing, “PBS and NPR do not even bother to run programming that would attract conservatives,” and “PBS has a 67% liberal and 12% conservative audience.” To do this, “the 47th President can just tell the Congress -- through the budget he proposes and through personal contact -- that he will not sign an appropriation spending bill that contains a



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penny for the CPB,” although heavy pushback should be anticipated from a team of PBS lobbyists.

While the public broadcast corporations would likely remain in business, due to membership models of corporate and nonprofit financial support, federal defunding would strip them of their status as noncommercial education (NCE) stations and thus access to FCC’s “left of the dial” lower-end frequency channels that allow for long-distance FM broadcasting. It would force them to pay regulatory fees for NCE television broadcast station licenses for which they are now exempt as NCEs. Finally, Namdar calls for the president to instruct the FCC to exclude PBS and NPR stations.

STC 2025 Commentary: Namdar, who served as VP of USAGM, is thoroughly critical of the USAGM, which was set up to oversee production and distribution of “pro-America” propaganda abroad, but, she feels, has too often broadcast programs and content that are critical of Trump or conservative viewpoints, and are vulnerable to infiltration by “anti-American” spies – a national security issue. Her complaint is that USAGM leadership are often operating like the mainstream media – in other words, too independently. Her call is to reclaim control of America’s media mouthpiece to serve Trump’s and a conservative ideological foreign policy agenda – or totally silence it.

The singular goal of Namdar’s call to strip federal funding from PBS and NPR – a familiar one for conservatives – is to help reduce and silence mainstream media, liberal and left voices, and stories from the US radio airwaves. Defunding and loss of NCE status would impose new financial challenges on these public broadcast stations, and would also negatively impact left-of-center Pacifica Radio. With this move, conservatives also seek to reduce secular educational programming on lower-frequency FM stations with longer reach to public audiences.

Chapter 8 - Key Points

- ✓ The USAGM and VOA need a complete reform – or be eliminated if that’s not possible
- ✓ The president and NSC should have oversight of the USAGM, or alternatively, the State Department’s Office of Global Public Affairs at the Department of State to assure messaging does not reflect any enemy “anti-American” messaging
- ✓ The National Security Council should oversee VOA content
- ✓ USAGM employees need better vetting; the agency is vulnerable to foreign spies
- ✓ The USAGM should never be used for domestic broadcast, only foreign
- ✓ Federal funding to PBS should be cut on grounds it has liberal bias
- ✓ Abolish federal funding to strip PBS, NPR (and Pacifica Radio) of noncommercial education (NCE) status as “left of the dial” stations with longer, low-frequency reach
- ✓ This would force the stations to pay regulatory fees not paid by NCE stations



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CHAPTER 9 . AGENCY FOR INTERNATIONAL DEVELOPMENT. Author: Max Primorac, former Chief Operating Officer and Assistant to the Administrator, Bureau of Humanitarian Assistance, USAID; also Director, Douglas and Sarah Allison Center for Foreign Policy, The Heritage Foundation.

USAID leads the US government’s international development and disaster assistance programs. Here, Primorac lays out a radical reordering of the agency to reverse, on Day One of a new Administration, “the gross misuse of foreign aid by the current Administration to promote a radical ideology that is politically divisive at home and harms our global standing.” Biden has “decoupled US assistance from free-market reforms that are the keystone of economic and political stability,” Primorac charges.

Project 2025 calls for a radical overhaul to make USAID a pro-life agency, staffed with conservatives, funding only local NGOs and international programs aligned with pro-life values and priority conservative foreign policy objectives, and actively seeking to fund aligned faith-based groups. Primorac calls for returning to the approach begun by Trump, to cut back on USAID’s foreign aid, and instead, encourage countries to be self-reliant, while promoting international religious freedom as a pillar of the agency work and fighting reforms related to diversity, equity, and inclusion. Trump restructured the agency to provide grants to local faith-based organizations, and implemented USAID reforms to promote conservative Christian pro-life and pro-family policies. Project 2025 would go much further and deeper to extend this.

Proposals include:

- ✓ Cutting USAID’s global footprint to its pre-Covid 2019 budget level
- ✓ “Deradicalize” agency programs and structures (DEI, gender reforms), and realign to promote conservative Christian values and ideology
- ✓ To help execute the agency reforms, authorize the USAID Administrator to take on the additional role of Director of Foreign Assistance (DFA), with the rank of Deputy Secretary at the Department of State in charge of all US foreign assistance. (A similar role was created under the George Bush administration and ended by Obama)
- ✓ In foreign policy, make China a USAID priority focus and take steps to highlight the US free market system vs. China’s “mercantilist authoritarianism” to encourage other countries to economically engage with the US over China
 - The US should establish a “counter-China” infrastructure at USAID, and “end the climate policy fanaticism that advantages Beijing,” suggests Primorac

Climate policy funding reversals:

Under Biden, USAID declared itself a climate agency that “has incorporated its radical climate policy into every USAID initiative,” states Primorac, and redirected its private-sector engagement strategy to shift away from fossil fuels to renewable energy. He proposes a sharp reversal of course for the next Administration, arguing that, globally, “the financial resources needed to transition away from fossil fuels are unachievable”



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Climate proposals include:

- ✓ Rescind all climate policies from US foreign aid programs -- specifically USAID's Climate Strategy 2022–2030
- ✓ Shut down USAID's offices, programs, and directives designed to advance the Paris Climate Agreement
- ✓ Narrowly limit funding to traditional climate mitigation efforts.
 - USAID resources are best deployed to strengthen the resilience of countries that are most vulnerable to climatic shifts, Primorac argues.
 - USAID should stop collaborating with, and funding, progressive foundations, corporations, international institutions, and NGOs that advocate "climate fanaticism"

Eliminate funding for DEI policies:

Primorac levies vitriol at the integration of DEI reforms and policies throughout USAID's structure, including creation of DEI committees and adoption of an agency-wide DEI dashboard and scorecard for its bureaus, missions, and offices. "The upshot has been to racialize the agency and create a hostile work environment for anyone who disagrees with the Biden Administration's identity politics," writes Primorac, calling for complete dismantling of the DEI policy apparatus.

DEI proposals:

- ✓ Eliminate the Chief Diversity Officer position and DEI advisers and committees
- ✓ Cancel the DEI scorecard and dashboard; remove DEI requirements from contract and grant tenders and awards
- ✓ Issue an agency directive to cease promotion of the DEI agenda, including "the bullying LGBTQ+ agenda"
- ✓ Provide staff a confidential medium through which to adjudicate cases of political retaliation that agency or implementing staff suffered during the Biden Administration
- ✓ Eliminate funding for partners that promote DEI practices and consider debarment in egregious cases
- ✓ Return the authority over all civil rights issues at USAID to the agency's Office of Civil Rights

Anti-gender reforms. Primorac critiques USAID's support for sexual and reproductive health and reproductive rights, "gender equality," and "women's empowerment" and advocacy for individuals who claim minority status or vulnerability. That is a guise for promoting abortion, gay rights, and race-based DEI policies, he suggests.

He calls for replacing current officials who head USAID's gender offices with pro-life political appointees, and revising agency regulations to reflect pro-life values with a focus on family.



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Proposed reforms:

- ✓ Rename the USAID Office of Gender Equality and Women’s Empowerment (GEWE) as the USAID Office of Women, Children, and Families and refocus and realign resources to that office
- ✓ Re-designate the Senior Gender Coordinator to be “an unapologetically pro-life politically appointed” Senior Coordinator of the Office of Women, Children, and Families
- ✓ Eliminate over 180 gender advisors and USAID points of contact embedded in Missions and Operating Units throughout the Agency
- ✓ Rescind President Biden’s 2022 Gender Policy and refocus it on Women, Children, and Families
- ✓ Revise the agency’s regulation on “Integrating Gender Equality and Female Empowerment in USAID’s Program Cycle” to remove all references, examples, definitions, photos, and language on USAID websites, in agency publications and policies, and in all agency contracts and grants that include the following terms: “gender,” “gender equality,” “gender equity,” “gender diverse individuals,” “gender aware,” “gender sensitive,” etc.
 - also remove references to “abortion,” “reproductive health,” and “sexual and reproductive rights” and controversial sexual education materials
- ✓ The Office of Women, Children, and Families should implement the Geneva Consensus Declaration on Women’s Health and Protection of the Family and prioritize partnerships with local organizations, including faith-based organizations (FBOs)

Pro-Life Proposals: Arguing that “protecting life” should be among the core objectives of United States foreign assistance, Primorac says that promotion of pro-life policies must be a key goal of USAID’s work. He calls for reinstating the “Protecting Life in Global Health Assistance (PLGHA) policy,” – known as the Mexico City Policy – that Biden then revoked.

The PLGHA requires foreign NGOs to agree to not perform, or actively promote, abortion in foreign countries as a condition of receiving US assistance. Trump expanded the Mexico City Policy to “global health assistance furnished by all departments or agencies” estimated to total \$8.8 billion annually.

Biden also restored funding to the United Nations Population Fund (UNFPA) which had been taken away due to its support for women’s reproductive health.

Primorac argues international NGOs who support abortion continue to receive US government funding and benefit from loopholes in laws that conservatives must act to close with new legislation. They should also rescind President Biden’s memorandum entitled “Protecting Women’s Health at Home and Abroad,” issued on January 28, 2021, and continue to apply the Helms Amendment, which forbids the use of US taxpayer dollars for abortion.



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Religious freedom Conservatives consider “international religious freedom” to be central to USAID’s development efforts, but the Biden administration has resisted that, states Primorac.

To do that, USAID should:

- ✓ Train all USAID staff on the connection between religious freedom and development
- ✓ Integrate religious training into all the agency’s programs, including the five-year Country Development and Coordination Strategies due for updates in 2025
- ✓ Strengthen USAID relationships with local faith-based leaders and build on local programs that serve the poor
- ✓ Congress should appropriate funding to USAID to support persecuted religious minorities in line with Executive Order 13926
- ✓ Appoint a political appointee to be USAID’s Senior Procurement Executive and Director of its Office of Assistance and Acquisition (OAA) in the Bureau of Management (M) – M/OAA – a critical position -- to oversee procurement, contracts, and USAID grants for adherence to language and terms of the Policy on Protecting Life in Foreign Assistance

PEPFAR The President’s Emergency Plan for AIDS Relief (PEPFAR) is given high marks for “localization” – successfully and rapidly scaling up its HIV and health programs. The PEPFAR model should be replicated, states Primorac, including its data reporting system that supports transparency. He also calls for:

- ✓ Beefing up the Global Health Bureau’s portfolio
- ✓ Increasing grants to faith-based institutions, among local partners
 - Work to expand networks of private and faith-based health organizations.
- ✓ Aggressively cut back on partnerships with “wasteful, costly, and politicized UN agencies, international NGOs, and Beltway contractors” – those deemed not aligned with a conservative religious values mission

“All new programs in Africa should build on existing local initiatives that enjoy the support of the African people,” the author states – a veiled reference to supporting pro-life issues but not pro-choice policies or issues such as gender or LGTBQ+ equality.

WHO, UN: The next conservative Administration should designate a political appointee to help coordinate cross-agency efforts to hold the US government’s multilateral partners (UN and WHO agencies and other international organizations) accountable to financial and programmatic benchmarks, “including assurances that language promoting abortion will be removed from UN documents, policy statements, and technical literature,” states Primorac.

Humanitarian Assistance

Primorac argues that humanitarian assistance for natural or man-made disasters has morphed into a pseudo-aid industry that is propped up by ongoing crises.



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Proposed Reforms:

- ✓ Resize and repurpose USAID’s humanitarian aid portfolio to “restore its original purpose of providing emergency short-term relief, prepare vulnerable communities for transition, and do no harm....” To do this:
 - Require USAID and the State Department to devise country-based exit strategies that term-limit the duration of humanitarian responses and transition funding from emergency to development projects
 - Transfer away from large awards to large, “corrupt” UN agencies, global NGOs, and contractors to local, especially faith-based, entities operating on the ground
- ✓ Move away from a foreign aid model to one that promotes private-sector solutions to development problems and ends the need for future foreign aid
 - In the interim, Project 2025’s legal teams should prepare to help faith-based groups access the existing USAID pie. To do this:
 - Appoint a “commanding team of Schedule C attorneys in the Office of the General Counsel (OGC) to issue clear guidance on the eligibility of faith-based organizations for USAID funding within weeks of the inauguration

Other proposals:

- ✓ On ‘Day One,’ USAID should halt all agency-wide training and put in place modules reflecting the new Administration’s policies
- ✓ On Schedule F with the Excepted Service: Make USAID “one of the agencies to pilot-test a reinstated Executive Order 13957,16 which created a Schedule F within the Excepted Service:
 - This would allow USAID to “aggressively recruit and place candidates into term-limited positions under Schedule A of the Excepted Service (especially veterans)”
 - To execute this reform, the White House Office of Presidential Personnel would allow the USAID Administrator to explore (with the Office of Personnel Management), *if* USAID could hire personnel under *both* the Administratively Determined authority and Schedule C of the Excepted Service
- ✓ Assure political appointees in the Bureau for Legislative and Public Affairs (combined with hires under Schedule A) review and edit USAID’s public-facing web pages and social media accounts to eliminate material not conforming to Administration’s policies
- ✓ Shift USAID policy-making authority from the Bureau for Policy, Planning to the Office of Budget and Resource Management (BRM), located in the Office of the Administrator, and staffed by political appointees
 - A renamed Office of Budget, Policy, and Resource Management (BPRM) would then oversee USAID’s policy system, the Automated Directives System (ADS), including policy amendments and reviews to reflect Administration’s viewpoint
- ✓ Make rapid staffing of key positions at the Bureau for Democracy, Development, and Innovation (DDI) a high priority. The DDI oversees USAID’s non-health, non-humanitarian funding



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- Carry out a rapid revision of policies under DDI responsibility and direct new funds to ethnic and religious minorities and faith-based organizations

STC 2025 Commentary: The proposed radical gutting to realign USAID’s mission, funding, and international programs to strictly reflect a neo-conservative, pro-life, Christian Bible-centered agenda is sweeping, and stands to have major impacts on key sectors, including economic, public health, education, environmental, relief and refugee, among others, including pluralism and democracy. It would strip US funding and support away from, among others, international and local aid agencies that now serve the most vulnerable populations in societies. The potential negative global impacts are enormous, given the current impact and influence of US assistance via USAID programs.

While the author praises PEPFAR for its successful “localization” scale-up funding of effective country-based HIV prevention and care programs, the veiled reference to cutting funds for programs that fail to adhere to a conservative agenda poses a veiled threat to current Biden PEPFAR programs and policies found to be most effective, that are tailored to educate and support vulnerable Key Populations, including LGBTQ+ individuals, sex workers, women and families, those living in poverty, including displaced, unhoused, and refugee populations.

The internal restructuring of authority at USAID, including in procurement and policy management, and proposed use of Schedule F in the Excepted Services, is in line with Project 2025’s broad mission to rapidly place a corps of dedicated loyalists who may lack civil service experience to carry out conservative proposals, using novel legal and policy instruments. The result would be an unvetted, unelected team of Christian conservatives at USAID with possibly limited government experience, tasked to advance their extremist Christian pro-life foreign policy and foreign aid agenda, aided by private sector and aligned faith groups they fund.

Chapter 9 - Key Points:

- ✓ Cutting USAID’s global footprint to its pre-Covid 2019 budget level
- ✓ “Deradicalize” agency programs and structures (DEI, gender reforms), and realign to reflect conservative Christian values and ideology.
- ✓ In foreign policy, make China a USAID priority focus, highlight US free market system
- ✓ Sharply reverse Biden policy: rescind all climate policies from US foreign aid programs
- ✓ Dismantle USAID’s DEI policy apparatus; stop DEI promotion
- ✓ Make anti-choice policies the key goal of USAID’s work
- ✓ Reinstate the “Mexico City Policy” (“Protecting Life in Global Health Assistance”) (PLGHA) that denies pro-abortion policies as a condition of receiving US assistance
 - remove all references, examples, definitions, photos, and language on USAID websites, publications, policies, contracts, and grants that include the terms: “gender,” “gender equality,” “gender equity,” “gender diverse individuals,” “gender aware,” “gender sensitive,” etc.



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- remove references to “abortion,” “reproductive health,” and “sexual and reproductive rights” and “controversial sexual education materials”
- ✓ Make “international religious freedom” central to USAID’s development efforts
- ✓ Assure groups given PEPFAR funds align with presidential agenda values
- ✓ Transfer away from large awards to large, “corrupt” UN agencies, global NGOs, and contractors to local, especially faith-based, entities already operating on the ground

SECTION 3. THE GENERAL WELFARE

A Section 3 introduction discusses the highlights of myriad proposals that follow in chapters 10 through 20. No author is listed, suggesting the co-editors of The Heritage Foundation are key authors. They highlight needed changes at Health and Human Services, which houses the federal health assistance programs, Medicare and Medicaid, whose large budgets are to blame for the ongoing national debt, conservatives argue.

Here, Project 2025 aims fury at the Centers for Disease Control and Prevention (CDC) and the National Institutes of Health (NIH) for their handling of the Covid epidemic, including “irrational, destructive, un-American mask and vaccine mandates,” per Project 2025. They also highlight the role of NIH, and Director Anthony Fauci, who is deemed villainous. “NIH was responsible for paying for research in aborted baby body parts, human animal chimera experiments—in which the genes of humans and animals are mixed, “and “gain-of-function viral research that may have been responsible for COVID-19” claim conservative critics.

The HHS and Department of Justice are given special attention here for having “gone off the rails” with a cultural agenda of “Leftist wokeism.” The next HHS Secretary, Project 2025 proposes, “should pursue a robust agenda to protect the fundamental right to life, protect conscience rights, and uphold bodily integrity rooted in biological realities, not ideology.” They should reverse the Biden Administration’s focus on “‘LGBTQ+ equity,’ subsidizing single-motherhood, disincentivizing work, and penalizing marriage” with a pro-life, pro-family agenda.

The DOJ “should also enforce existing federal law that prohibits mailing abortifacients, rather than harassing pro-life demonstrators; respect the constitutional guarantee of the freedom of speech, rather than trying to police speech on the internet; and enforce federal immigration laws, rather than pretending there is no border.”

The following chapters present the key proposals for each department:

Chapter 10. Department of Agriculture. Author Daren Bakst, Deputy Director, Center for Energy and Environment, Senior Fellow at the Competitive Enterprise Institute (CEI) and former Senior Research Fellow at The Heritage Foundation, with noted assistance from *Rachael Wilfong*.



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Bakst calls for removing government hurdles to food production for the agricultural industry by reshaping the USDA and reversing Biden policies that conservatives say place climate and environmental concerns over the need to “efficiently produce safe food.” Removing safety and regulatory controls on large-scale farming and producers of agricultural products is central to this goal. Other proposals seek to remove “unjustified” foreign trade barriers blocking market access for American agricultural goods. “Reforms should be based on “sound science, personal freedom, private property, the rule of law, and service to all Americans.”

Here, conservatives argue against the ‘science’ of climate change and industrial threats that underlie Biden policies including “climate smart” policies designed to support food and environmental safety and agricultural sustainability.

Proposals include:

- Via Executive Order, remove all references to transforming the food system on its website and champion principles
 - Adopt ‘America First’ agricultural policies and remove obstacles across the food chain for US farmers
 - Remove the US from UN-driven sustainable-development food production schemes
 - Review policies that impose preferred agricultural practices on farmers (i.e., organic farming, sustainable best practices)
- Avoid, or amend the Secretary of Agriculture’s discretionary authority under section 5 of the Charter Act, of a slush fund of the Commodity Credit Corporation (CCC), a crop insurance program, for pet projects.
 - At a minimum, limit funding to help farmers and ranchers only.
- Review, and eliminate or reform farm subsidy programs
- Separate the agricultural and nutrition aspects of the Farm Bill
- Put nutrition programs like SNAP under HHS, reinstate SNAP work requirements, and tighten eligibility for food stamps programs, including Thrifty Food Program, and Women, Infants and Children (WIC) benefits program, and re-evaluate regulations on baby formula to speed access.
- Review and tighten eligibility for free federal meal programs for K-12 students (the Community Eligibility Provision), applying CEP rules per school, not school district. Consider eliminating CEP.
- Champion elimination of the Conservation Reserve Program; review and reform erodible land wetland conservation policies.
- Promote proactive agriculture policies, removing barriers to state upmarkets and export markets
- Counter scare tactics regarding agricultural biotechnology
- Repeal the federal labeling law, push volunteer labeling
- Restore Trump Executive Order 13855 to promote active management of forests and reduce wildfire risks, but promote timber sales



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- Repeal or reform USDA dietary guidelines

STC 2025 Commentary: Bakst’s vision echoes longstanding conservative calls to remove government oversight of food and agricultural safety and farming husbandry practices, arguing they hamper business for farmers and ranchers. This includes the call for less environmental stewardship and rules related to sustainability that cut into profits for big agricultural producers. These cuts, coupled with calls to remove food safety labeling, and decrease USDA oversight, would weaken current federal protections for food consumers of American agricultural and animal products. While some reforms might reduce costs of doing business for small farmers, the proposals reflect the goals of big agribusiness producers and desire to lower costs to compete with global competitors.

The call to limit federal welfare food programs, and require SNAP recipients to work, is also a familiar conservative argument that too many people getting federal assistance are taking advantage of the system, choosing to live below the poverty level rather than work. If enacted, the reforms would likely increase hunger in America, and push more of the poorest Americans into greater food insecurity, impacting young children and mothers with limited incomes.

Chapter 10 - Key Points:

- ✓ Via Executive Order, reverse Biden administration regulations for food and animal safety, including safety rules for large-scale farming
- ✓ Remove Biden ‘Climate Smart’ regulations for environmental protection, climate change
- ✓ Push ‘America First’ agricultural production policies
- ✓ Decrease welfare access: enact work requirement for SNAP food program; tighten eligibility for food stamps, Thrifty Food, and WIC; K-12 school lunch program access
- ✓ End required food (safety) labeling; replace with voluntary labeling
- ✓ Reform USDA; revise its dietary guidelines
- ✓ Restore prior Trump Executive Order to promote timber sales, forest clearing

Chapter 11. Department of Education. Author: Lindsey M. Burke, *Director of the Center for Education Policy at The Heritage Foundation. Burke served on Virginia Governor Glenn Youngkin’s transition steering committee and landing team for education, and sits on the board of the Educational Freedom Institute, and advisory board of the Independent Women’s Forum Education Freedom Center.*

Burke makes the conservative mission with public education clear in the opening line of this chapter: she calls to cut federal education – that is the end goal. A conservative president should sign into law a Department of Education Reorganization Act (or Liquidating Authority Act) to direct how to “devolve the agency as a stand-alone Cabinet-level department.” She calls for



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sharply decreasing the DoED’s authority and offices, shifting funding to states and local agencies, and transferring DoED’s areas of responsibility to other agencies to control funds, student loans, and educational school choices where possible.

Broadly, Burke seeks to limit government support for secular, public education and increase space and funding for “not only ‘traditional’ liberal arts colleges and research universities but also faith-based institutions, career schools, military academies, and lifelong learning programs.” She wants to allow states to opt out of federal education programs, and calls for rescinding the National Education Association’s congressional charter, branding it a “radical special interest group that overwhelmingly supports left-of-center policies and policymakers.”

Burke focuses discussion on the conservative platform of promoting parental rights to decide what their children are taught – over educators or school directors. She backs a federal Parents’ Bill of Rights in “their right and responsibility to raise, educate, and care for their children.” Proposals include redirecting federal education dollars, placed into a proposed “Education Savings Account” for each parent/family to spend on the school of their choice, funded by local and state taxpayers. Citing Arizona as a model, Burke writes, this step would “empower parents to choose a set of education options that meet their child’s unique needs.” She also calls for state block granting of federal education “without strings.”

Burke also advocates pushing more students into apprenticeship and technical career programs, versus four-year “higher education establishments captured by woke ‘diversicrats,’” while taking aim at the federal accreditation system that is too stringent. She also decries “equity” guidelines in the federal education department that, she argues, produce too much red tape and are too costly.

Finally, Burke calls for elimination of all Title XI and VI regulations related to gender and racial disparities, removing sexual orientation and gender identity (SOGI) and critical race theory (CRT) discussions in classrooms (*see below*). She wants a new Title IX rule to insist that “sex” is properly understood as a fixed biological fact, eliminating SOGI as a concept. On CRT, she states: “school officials should not require students or teachers to believe that individuals are guilty or responsible for the actions of others based on race or ethnicity.”

Among proposals, Burke highlights five priority targets for regulatory reform:

- ✓ Charter School Grant Program Priorities:
 - Rescind new requirements and lessen federal restrictions on charter schools. This would increase private, faith-based school choice
- ✓ Civil Rights Data Collection:
 - Eliminate the OCR’s requirements to create and collect data on a new “nonbinary” sex category and end data collection on only male and only female athletic participation
- ✓ Student Assistance General Provisions, Federal Perkins Loan Program, and William D. Ford Federal Direct Loan Program Final Regulations:



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a public education and mobilization campaign

- Completely reverse the current federal government student loan program and make government only a guarantor, not a direct lender -- loans should be treated as investments and provide a market return to lenders
- Establish a new federal corporation run by presidential-picked loyalists to run the student loan program and task Treasury Department to enforce loan collection
- ✓ Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance (Title IX):
 - Amend Title IX to include due process requirements for those accused of sexual misconduct
 - Define “sex” to mean only biological sex recognized at birth
 - Establish “sex” as a fixed biological fact by passing a new Title IX rule saying so
 - Abandon Title IX redefining “sex” to mean “sexual orientation and gender”
 - Strengthen protections for faith-based educational institutions, programs, and activities
 - Assign political appointees to do a full (retroactive) review of all Title IX investigations related to gender identity and/or sexual orientation cases
 - Drop all such ongoing or pending investigations
 - Inform affected school districts they can drop such Title IX policy changes

On racial disparities/ Civil Rights Act Title VI:

- Review Title VI policies on school discipline and racial disparities; move away from lenient ‘restorative justice’ practices
- End DoED and DOJ investigations of Title VI cases based on allegations of disparate impact by issuing a joint DoED-DOJ guidance directive on this
- Clarify that Title VI of the Civil Rights Act does not include a disparate impact standard
- Prohibit any federal agency from withholding services from federal or state agencies—that choose not to replace “sex” with “SOGI” in that agency’s administration of Title IX
 - This includes K-12 schools with school lunch programs
- ✓ Assistance to States for the Education of Children with Disabilities, Preschool Grants for Children with Disabilities (Equity in IDEA):
 - Rescind regulations that now consider race and ethnicity in the identification, placement, and discipline of students with disabilities
 - This step would curb “raiding special education funding to pay for CRT-inspired ‘equity’ consultants and professional development”

Other reforms include:

- ✓ Shift responsibility for education of “federal” children -- students in military families, D.C. residents, Native Americans -- to agencies serving these groups and expand education choice
- ✓ Reject gender ideology and critical race theory in civil rights education



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a public education and mobilization campaign

- ✓ End both Executive branch and agency overreach of education policies
- ✓ Transfer federal funding for lower-income school districts to the DHHS's future Administration for Children and Families
- ✓ Block-grant and narrow funding to Historically Black Colleges and Universities (HBCUs) and tribally-controlled colleges
- ✓ Implement "risk adjusted" higher education outcomes data for colleges and schools to more carefully isolate the impact of educational quality versus socioeconomic status and other factors
- ✓ Reform The Family Educational Rights and Privacy Act (FERPA) to protect the privacy of student education records and boost parental rights and consent about disclosure of topics discussed privately with teachers, including:
 - Use of puberty blockers, hormone treatments and gender-altering surgery
 - Adoption of pronouns different from names /gender noted on birth certificate
- ✓ Do not require federal education employee or contractor to use a pronoun that does not match a person's biological sex if contrary to their religious or moral convictions

STC 2025 Commentary: Burke makes the conservative view on secular public education crystal clear: it is the enemy and the goal is to eliminate it, starting with a presidential decree to remove the DOE as a Cabinet-level department to reduce its power in the next administration. She makes little effort to mask the end goal of supplanting secular education with a Bible-driven curricula, and shifting public dollars to the private sector and Christian educational institutions. Hardline religious conservatives feel they are losing their children and traditional values to public schools and liberal teachers who champion secular and "radical leftist" "woke" values.

The call for eliminating equity and diversity initiatives (SOGI, CRT) reflects the specific fears they voice so loudly: the fact that America's youth are embracing broader conceptions of gender and sexuality, as well as women's rights, including reproductive rights, and that more white Americans than ever, including youth, are acknowledging that structural racism and white supremacy remain embedded in the tissue our nation as unfinished business. That is behind the political push for parental rights, echoed in this chapter.

Burke's proposals for reforming the educational sector make stark the deep white supremacy agenda of Christian conservatives, who are intent on halting and reversing progress made to tackle racial disparities and discrimination. That is visible in the call to cut funding for Block-grant and narrow funding to HBCUs and tribally-controlled colleges. White conservatives do not want America's youth to be taught about America's racist legacy or racial inequality, and they don't want to support more students of color going to college, or having a more level playing field in education, just like they don't want anyone telling their children it's okay to be gay, or allow a transgender child to use a bathroom.

Their racist agenda is also reflected in the paternalistic use of the term "federal" children to refer to Native American students, and children of military families, and the proposal to remove the DOE's authority over these students, while boosting parental rights and school



Stop the Coup 2025
a public education and mobilization campaign

choice. It's all about shifting authority and economic power away from public education to private schools where young people can be taught Christian and so-called traditional family values. And it pushes an educational agenda of whiteness by denying the need to teach Black and brown history and redress missing pieces of the social story of America.

If enacted, Burke's proposals would go very far to harm and limit federal funding for public education and advance theocratic education in its stead. The elimination of SOGI concepts and protections would erase public visibility and knowledge of LGBTQ+ lives, and likely increase, not decrease, intolerance and discrimination against children who identify as non-binary or transgender. Similarly, the call to ban CRT and the Title VI focus on racial disparities is more than a move to deny racism and racial harms and the responsibility of public education institutions to address these: it's a racist step in itself – a deliberate action to decrease the visibility of Black and brown people, voices, and communities, and to limit the exposure of America's public school students to a diversity of viewpoints.

The reversal of policy on student loans also has racist dimensions, given statistics that show that a majority of loan beneficiaries are low-income students of color. Burke's proposals would make it harder, not easier, for them to access money to go to college, with little forgiveness for loan defaults and stronger enforcement in collections.

In the bigger picture, then, Burke's proposals represent a profoundly anti-higher education, anti-public education, anti-diversity agenda. Under the guise of free expression, she advocates giving parents the power to censor classroom discussions and exposure to ideas different from their beliefs, especially on topics related to gender, race, women's rights, and American history. The result would be to reduce access to higher education at public institutions, and to narrow and control what America's students are taught – namely a very conservative, white-led, traditional Christian-based education.

Chapter 11 - Key Points:

- ✓ Cut DoED as a Cabinet-level agency, reorder chain of command, put loyalists in charge
- ✓ Redirect federal dollars to state and local governments, champion alternatives to liberal, higher education schools: private charter, trade, technical, and faith-based institutions
- ✓ Reverse Biden's student loan forgiveness program and crack down on loan enforcement
- ✓ Eliminate equity and diversity regulations in Title IX and VI rules (SOGI, CRT)
- ✓ Set up a Parental Savings Account program to fund parent's school choice; boost parental control of classroom discussions and disclosure of school information to parents

Chapter 12. Department of Energy and Related Commissions.

Author: Bernard L. McNamee, an energy and regulatory attorney with a major law firm; formerly a member of the Federal Energy Regulatory Commission.



Stop the Coup 2025
a public education and mobilization campaign

The conservative mission for the Department of Energy (DOE) is to prioritize dominance in energy and science, which will “ensure that Americans have abundant, affordable, and reliable energy; create good-paying jobs; support domestic manufacturing and technology leadership; and strengthen national security.”

McNamee argues that the US is in an energy crisis that has been created by ideologically driven “extreme ‘green’ policies” that raise the cost of energy for Americans, curtail business development, and make the US dependent on countries such as China. He notes that there have been potentially devastating cyberattacks on the US energy infrastructure and electric grid by Iran, China, Russia, and North Korea, and focuses on China as the main threat to energy security, through espionage.

The chapter presents a plan to move away from a focus on climate change and renewable energy sources and back toward what he calls “reliable” fossil fuels. In this scenario, all individuals should be able to choose whatever source of energy they prefer while the government encourages private-sector development of all energy sources, including nuclear.

McNamee proposes renaming and reorienting the DOE as the Department of Energy Security and Advanced Science (DESAS).

Its new focus should be:

- ✓ On energy security
- ✓ Promoting US energy resources to US allies
- ✓ Leading the world in advanced science (through the National Labs)
- ✓ Remediating former Manhattan Project sites
- ✓ Developing new nuclear weapons

The departmental reorganization would thus focus on energy security; eliminate the Office of Clean Energy Demonstrations and return this work to the private sector; put an end to DOE interference in export of natural gas due to climate-change concerns; insist that FERC (Federal Energy Regulatory Commission) be an economic regulator and not a climate regulator; and streamline the bureaucracy to allow faster development of new nuclear reactors and weapons.

At the same time, the DOE should halt all “politicized social agendas,” such as Energy Justice and DEI.

The new department, DESAS, would coordinate with the National Security Council, the departments of Defense, State, Treasury, and Commerce along with the intelligence community. The refocusing of the DOE as DESAS would include a review of all federal science agencies; they should be prioritized according to how they support energy security and national security.

Remediation of nuclear waste sites should now include more private sector responsibility for waste disposal, as a relief to taxpayers, and develop more nuclear storage sites. In terms of military capacity, the development of new nuclear warheads and naval reactors would be paralleled with putting an end to nonproliferation agreements (such as the one with Iran).

This reorganization would require specific legislative changes and executive orders. It would also require the department to step back from private sector initiatives and reduce regulatory obstacles.



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a public education and mobilization campaign

The chapter lists all the various Offices that comprise the DOE, explaining their functions and listing desired reforms; McNamee argues that some of these Offices should be eliminated or defunded. Overall, the rationale for the reorganization of the DOE focuses on the following assumptions:

- ✓ All energy sources should be used: developing fossil fuels is a key part of the plan
- ✓ The National Labs should be supported in developing technology projects that maintain the US edge in tech, and are used primarily to benefit Americans
- ✓ The National Labs should continue to be supported in maintaining science dominance (for example, artificial intelligence and quantum information sciences)
- ✓ The US should aggressively pursue strategic energy resources wherever possible (e.g., the Arctic)
- ✓ Climate change should not be the driver of energy policy
- ✓ Security is key: security of the grid and the energy infrastructure; security from cyberattacks; freedom from dependence on other countries for energy
- ✓ The government should not interfere with the market by favoring or supporting some private sector developments over others
- ✓ Renewable energy development should not be subsidized by taxpayers
- ✓ The private sector (not the government) should be responsible for developing ways to control carbon emissions
- ✓ Regulations should be eliminated if they hinder the private sector from developing new sources – for example, nuclear reactors
- ✓ Taxpayers should not support federal programs that seek solutions for climate change (a “partisan political agenda”)

Finally, McNamee suggests that the Office of Policy develop a National Energy Security Strategy.

STC 2025 Commentary: McNamee’s review of the DOE articulates well-rehearsed conservative arguments about the importance of the free market. He advocates eliminating all government funding for renewable energy sources and control of carbon emissions.

The plan would change regulations and licensing processes, in order to move DOE responsibility for innovation in renewable energy sources to the private sector. It would use legislation where necessary to reshape the DOE, rewrite its mission, and defund any aspects of it that do not comply with conservative ideology.

Chapter 12 - Key Points:

- ✓ Rename and reorient the DOE as the Department of Energy Security and Advanced Science (DESAS)
- ✓ Dismantle any government initiatives to deal with climate change
- ✓ Continue destructive mining for fossil fuels
- ✓ Eliminate government support for renewable energy sources



Stop the Coup 2025
a public education and mobilization campaign

- ✓ Deregulate nuclear reactor development

Chapter 13. Environmental Protection Agency. Author:

Mandy M. Gunasekara, former Chief of Staff at the US Environmental Protection Agency in the Trump administration; Principal Deputy Assistant Administrator for the Office of Air and Radiation.

In a conservative administration, the EPA would move regulatory efforts to the states and localities, who would lead with federal support, rather than the other way around. Gunasekara argues that this is consistent with the “concept of cooperative federalism” and would promote a “culture of compliance” rather than enforcement. Under conservatives, there would be transparency and accurate measures of progress.

Gunasekara suggests that there is currently skepticism about the EPA, which she attributes to the agency having been “coopted by the Left for political ends.” She argues that under Obama and Biden, it has been top-down and coercive, especially in relation to fossil fuels and pesticide use in agriculture. This has produced costly regulations that push industry overseas rather than solving environmental problems.

The EPA Administrator has been sidelined by Biden’s “climate czar,” and EPA activists have found ways to ignore the will of Congress. Biden uses scare tactics to misrepresent the state of the environment and the effect of climate change, and offers Americans a false choice; the conservative position rebuts this and suggests that there can in fact be both a strong economy and a healthy environment. EPA advisory committees have a lot of influence over policy “and their membership has too often been handpicked to achieve certain political positions. In the Biden Administration, key EPA advisory committees were purged of balanced perspectives, geographic diversity, important regulatory and private-sector experience, and state, local, and tribal expertise.”

The EPA was created in 1970 to deal with pollution remaining from the past. Gunasekara argues that under President Obama, and now under President Biden, it was expanded to include far-reaching political goals.

Under a conservative president, the agency would be reshaped to fulfill the following overarching goals:

- ✓ Leadership by states, not federal government
- ✓ Accountability for progress
- ✓ An emphasis on recognizing the social and economic effects of EPA regulations on communities
- ✓ Encouragement of cooperative compliance, not coercion
- ✓ Requirement for transparent science, and diversity of scientific opinion



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a public education and mobilization campaign

Under this plan, the EPA would undergo extensive reorganization that would begin with an Executive Order on Day One, and call for a review of the EPA's function. A team of political appointees would be ready to immediately step into positions across the entire agency.

The conservative position makes three main claims:

1. Democratic presidents have politicized the agency and over-expanded its mandate to cover issues such as Environmental Justice. Thus, in terms of structural reorganization, the agency would first move the Offices of Justice, Enforcement, Public Engagement, and Children's Health elsewhere, into other agencies.
2. The EPA relies on outdated and incomplete science. This would be countered by placing political appointees in to run the EPA's research and science activities. (For example, Gunasekara argues that the Office of Chemical Safety and Pollution Prevention (OCSP) "is constantly pressured to ban the use of certain chemicals, typically based on fear as a result of mischaracterized or incomplete science." She adds, "EPA's scientific enterprise [...] has rightly been criticized for decades as precautionary, bloated, unaccountable, closed, outcome-driven, hostile to public and legislative input, and inclined to pursue political rather than purely scientific goals.")

The science of climate change is an important element of this section, and Gunasekara argues that a high priority should be the repeal or reform of "outdated environmental statutes" such as the Global Change Research Act of 1990 [15 U.S. Code Chapter 56A, <https://www.law.cornell.edu/uscode/text/15/chapter-56A>], which states: "Industrial, agricultural, and other human activities, coupled with an expanding world population, are contributing to processes of global change that may significantly alter the Earth habitat within a few human generations."

3. The EPA is bloated and inefficient, and over-regulates, sometimes infringing on private property rights and placing unnecessary burdens on business and industry. Regulation should be eased to encourage economic development.

The chapter lists extremely detailed specifics of regulations, legislation, court cases, and executive orders that would need to be replaced, modified, or repealed to achieve stated goals.

STC 2025 Commentary: Chapter 13 recapitulates familiar conservative arguments about the need for American energy dominance, which they argue requires more reliance on fossil fuels. The other familiar argument is the call to loosen regulations and enforcement to allow business and industry more latitude and less concern about environmental effects. In this worldview, economics are always more important than environmental or climate change issues. In fact, Gunasekara does not agree that climate change is caused by human activity.

Chapter 13 - Key Points:

- ✓ Dismantle all attempts to address climate change, and challenge the accepted scientific position on the effect of human activities on the climate
- ✓ Leadership by states, not federal government
- ✓ Loosen regulations if they get in the way of business



Stop the Coup 2025
a public education and mobilization campaign

- ✓ Reduce enforcement of existing regulations

Chapter 14. Department of Health and Human Services.

Author: Roger Severino, *Vice President of Domestic Policy at The Heritage Foundation; director of the Office for Civil Rights at the US Department of Health and Human Services (HHS) from 2017 to 2021.*

Chapter 14 is one of the central departments in the remaking of the government, due to what Severino labels a crisis that threatens America’s long-term survival: a “precipitous drop in life expectancy” with “white populations alone losing 7 percent of their expected life span in just one year.” Severino proposes that HHS be renamed the **Department of Life**, and the new Secretary should install a pro-life task force of political appointees to ensure that the mission furthers the health and well-being of all Americans “from conception to natural death.”

To that end, Severino enumerates every area of the department’s work where abortion can be removed from the mission. He also notes every area where faith-based programming can be promoted, and outlines specific regulations that must be changed to accommodate religious exceptions (for example, allow adoption agencies to refuse to consider same-sex couples).

Severino emphasizes the department’s role in championing heteronormative marriage, under what he calls the Family Agenda: “The Secretary’s anti-discrimination policy statements should never conflate sex with gender identity or sexual orientation. Rather, the Secretary should proudly state that men and women are biological realities that are crucial to the advancement of life sciences and medical care and that married men and women are the ideal, natural family structure.” Gender-affirming care, like abortion, is labeled as harmful.

The chapter also addresses programs such as Medicare, Medicaid, and the Affordable Care Act; Severino argues for competitive market-based revisions and a general policy of leaving individuals to make their own health care choices; for Medicaid, work requirements and eligibility would be reviewed. In the same spirit of freedom, he proposes restructuring the CDC and NIH so that vaccine and mask mandates would no longer be part of public health policy.

STC 2025 Commentary: Here, Severino presents a radical, politicized plan to transform the Department of Health and Human Services into a department ruled by Christian religious values -- the opposite of “religious freedom,” since imposing those values affects everyone in the US. The plan also shreds the concept of public health, which relies on individuals agreeing to certain regulations for the benefit of the entire community.

*This chapter is complex, but has **four main goals:***

- ✓ First and foremost, enshrine anti-abortion policy in every single aspect of the department’s purview
- ✓ Weaken Medicare and Medicaid protections under the guise of “consumer choice”
- ✓ Use a biblical definition of marriage, and promote marriage wherever possible



Stop the Coup 2025

a public education and mobilization campaign

- ✓ Enshrine a binary definition of sex as the law of the land; label nonbinary gender and trans issues as harmful and unacceptable

Chapter 14 - Key Points:

- ✓ Rename HHS the ‘Department of Life,’ and center it around an anti-abortion agenda

On abortion, fertility, marriage, family

- ✓ Abortion is not health care (it harms women and girls)
- ✓ Ban Mifepristone and outlaw mailing it
- ✓ Ban the morning-after pill
- ✓ Remove all funding from Planned Parenthood
- ✓ Prevent Medicaid from paying for abortions
- ✓ Promote the rhythm method for contraception (fertility awareness–based methods)
- ✓ Ban fertility treatments such as three-person embryo creation
- ✓ Marriage and family should be defined by the Bible

On Sex, Gender

- ✓ Sex is binary; any challenge to this is “junk science”
- ✓ Gender affirming care causes “irreversible physical and mental harm”

On Insurance

- ✓ Turn Medicare into a free market program
- ✓ Make people pay for some care under Medicaid
- ✓ Put lifetime caps on Medicaid benefits

Chapter 15. Department of Housing and Urban

Development. Author: Benjamin S. Carson, Sr., MD, *former Secretary of the US Department of Housing and Urban Development.*

Carson opens Chapter 15 with a proposed reorientation of the department’s mission: the problem with HUD, he states, is that it has promoted the concept of “bureaucratically provided housing as a basic life need and, whether intentionally or not, fail[s] to acknowledge that these public benefits too often have led to intergenerational poverty traps, have implicitly penalized family formation in traditional two-parent marriages, and have discouraged work and income growth, thereby limiting upward mobility.”

HUD’s work is thus related to that of other departments in its goals of promoting economic self-reliance and the importance of the two-parent family. To reflect these goals, HUD would need to be restructured: a cadre of political appointees would execute this plan, and a



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a public education and mobilization campaign

Chief Financial Officer would be hired from the business world (as was previously done) to reform spending.

The first goal of a proposed HUD review would be to reconsider HUD's proper role in the housing market. More responsibility for housing matters should be shifted to the states and localities as well as other government agencies, eventually turning many of HUD's current responsibilities over to them. On Day One of a Conservative presidency, an immediate sweeping reform and paring down of HUD's mission would be enacted.

Carson identifies the obstacle as "the mission creep that inevitably occurs when Congress delegates power to an empowered and unelected bureaucracy that is insulated by civil service protections."

If implemented, the proposed reforms he discusses can help a new conservative Administration to use its Article II powers to rectify bureaucratic overreach, reverse the expansion of programs beyond their statutory authority, and end progressive policies that have been put in place at the department.

Here, too, the replacement of civil service employees with political appointees is vital to HUD restructuring. The first goal of loyalist appointees would be to "identify and reverse all actions taken by the Biden Administration to advance progressive ideology," including any climate change initiatives.

Certain principles would guide new policy:

- ✓ Federal housing should not be available for non-citizens (including mixed status families)
- ✓ Congress should enact legislation with eligibility requirements that "protect life" and;
 - Encourages upward mobility (work requirements)
 - Prioritizes two-parent families
 - Focuses on mental health and substance abuse issues rather than attempting to provide permanent solutions to homelessness
- ✓ The goal for long-term housing reform is to bring the private sector into the mix
 - For example, HUD's mandate was originally to construct the nation's affordable housing stock and promote "standards for decent housing and fair housing enforcement." This second goal, says Carson, has been "muddled by repeated application of affirmative race-based policies"
- ✓ A voucher system should be considered to expand use of private landlords and allow states and localities to have more say in housing; this would encourage competition in the public housing market
- ✓ Congress should prioritize support for single-family homes, since home ownership is the "backbone of the American Dream"

STC 2025 Commentary: The chapter on HUD presents a familiar conservative vision:

- ✓ Privatize wherever possible
- ✓ Transfer federal obligations to the states and radically cut down federal government oversight and obligations



Stop the Coup 2025

a public education and mobilization campaign

- ✓ Limit eligibility for benefits and limit time they can be used
- ✓ Promulgate religious beliefs and insert them into government policies wherever possible
- ✓ Replace civil servants with political appointees who pursue the president's will

Chapter 15 - Key Points:

- ✓ Non-citizens may not live in any federally assisted housing (including mixed status families)
- ✓ Time allowed for receiving housing benefits will be limited
- ✓ Married couples will be prioritized for housing
- ✓ Some responsibility for public housing will be moved to the private sector (via vouchers)

Chapter 16. Department of the Interior. Author: William Perry Pendley, *former senior official in the Ronald Reagan administration; leader, Bureau of Land Management for President Trump.*

The mission of the Department of the Interior (DOI) is to oversee, manage, and protect the nation's natural resources and cultural heritage; provide information about those resources; and honor the nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The DOI is responsible for more than 500 million acres of federal lands, including national parks and national wildlife refuges; 700 million acres of sub-surface minerals; 1.7 billion acres of the Outer Continental Shelf (OCS); 23 percent of the nation's energy; water in 17 western states; and trust responsibilities for 566 Indian tribes and Alaska Natives. Here, Pendley argues that President Biden is "at war" with the department's mission. The Biden administration, states Pendley, has been illegally prioritizing conservation rather than supporting economic development for those who wish to employ multi-use federal lands.

As stressed in Chapters 12 and 13, Conservatives are concerned with the US's global energy dominance or independence. Pendley argues that, under Trump, the US achieved "energy security." Thus a new conservative administration should immediately reverse specific Biden policies in order to encourage fracking and more drilling for oil (primarily in Alaska).

Notes Pendley: "Given the dire adverse national impact of Biden's war on fossil fuels, no other initiative is as important for the DOI under a conservative president than the restoration of the department's historic role managing the nation's vast storehouse of hydrocarbons, much of which is yet to be discovered." Biden's "war on fossil fuels," Pendley asserts, harms the US economy, which depends on cheap energy for economic development. More power must be given to states and Indian tribes to make decisions about energy production, he states.

Pendley argues that the effect of the Biden administration's policies has particularly affected two areas: the Western states, where the control of water and the use of federal lands for



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a public education and mobilization campaign

grazing are particularly important issues; and Alaska, where oil drilling on land held by Alaska Natives has been particularly contentious.

Other specific recommendations include:

- ✓ Stop using the Endangered Species Act to control the use of federal land (e.g. “de-list” the grizzly bear, the spotted owl, and the sage grouse)
- ✓ Stop illegally using National Monument Designations to close federal land to multiple uses
- ✓ Specifically allow Indian tribes to “develop their abundant oil and gas resources”
- ✓ Stop artificially boosting the demand for electric vehicles

Pendley states that Biden administration policies have had especially deleterious effects on Native Americans. He points to, for example, Biden’s failure to secure the border, thereby robbing “Indian nations on or near the Mexican border of safe and secure communities, while permitting them to be swamped by a tide of illegal drugs, particularly fentanyl.”

STC 2025 Commentary: Chapter 16 describes what conservatives see as an epic conflict between “environmental extremists” and those who want to make federal land more “productive” by promoting coal mining, mineral extraction, and drilling for oil and gas. As other conservatives argue, Pendley pushes for states to control the use of federal lands to support local economic development, which is prioritized over conservation.

Chapter 16 - Key Points:

- ✓ Reverse Biden policies to achieve ‘energy security’ by allowing more fracking and drilling for oil and gas, especially in Alaska
- ✓ Give states and Indian tribes more power to decide about energy production and land use
- ✓ Stop supporting the use of electric vehicles
- ✓ Keep federal land open for grazing

Chapter 17. Department of Justice. *Author: Gene Hamilton, former Counselor to the Attorney General at the US DOJ; Senior Counselor to the Secretary of Homeland Security; General Counsel on the Senate Committee on the Judiciary; Assistant Chief Counsel at US Immigration and Customs Enforcement; and as an Attorney Advisor in the Secretary’s Honors Program for Attorneys at the Department of Homeland Security.*

Chapter 17 outlines the purview of the DOJ: “Properly understood within the framework of a constitutional republic that values ordered liberty, the Department of Justice has two primary functions: protecting public safety and defending the rule of law.”



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a public education and mobilization campaign

Hamilton argues that this role has been perverted under Democratic presidents: “Large swaths of the department have been captured by an unaccountable bureaucratic managerial class and radical Left ideologues who have embedded themselves throughout its offices and components.”

In his plan for reform, he focuses first on the FBI, which he believes knowingly spread false claims on Russian interference in the 2016 election; misled the public about Hunter Biden’s laptop; and monitored social media for misinformation while censoring true information about the 2020 election. The DOJ as a whole, he argues, has focused more on prosecuting anti-abortionists while ignoring leftist crimes such as those committed by Antifa; abdicated its obligation to stop the flow of drugs (especially fentanyl) into the US; and abdicated its responsibility to uphold immigration laws. The current actions of the DOJ under Merrick Garland are, he argues, a “threat to the Republic.” He calls for reforms to overturn the current “politicization and weaponization” of the DOJ.

Hamilton proposes what he calls a return to law and order, noting that “Ordered liberty is at risk when our citizens lack physical safety, when career criminals do not fear the law, when foreign cartels move narcotics and illegal aliens into our nation at will, and when political leaders call citizens ‘domestic terrorists’ for exercising their constitutional rights.”

Proposed reforms:

- ✓ Replace career civil servants with a “vast expansion” of political appointees (“It is essential that the next conservative Administration place a high priority on reforming the DOJ and its culture to align the department with its core purposes and advance the national interest.”)
- ✓ Enact a complete review of the FBI (laid out in detail)
- ✓ Secure the border and rigorously enforce all immigration laws
- ✓ Aid the Department of Homeland Security in pursuing criminal aliens
- ✓ Interdict the flow of fentanyl from China through Mexico
- ✓ Align all litigation decisions to make them consistent with the president’s agenda
- ✓ Enforce laws against using the postal service to distribute abortion pills
- ✓ Prosecute voter fraud (transfer this responsibility to the criminal division)
- ✓ Halt investigations of any group engaging in lawful and, in many cases, constitutionally protected activity

The DOJ is also responsible for guarding constitutional protections. Hamilton cites an egregious example of the current DOJ’s failure to do this: *303 Creative LLC v. Elenis*, in which, as he describes it, the DOJ argued that a Christian website designer could be compelled to serve a same-sex couple, but could not compel an LGBTQ+ designer to serve an opposite sex couple.

The DOJ is also tasked with enforcing Federal Civil Rights Laws in Government, Education, and the Private Sector. Hamilton argues that the DOJ currently practices “affirmative discrimination in all aspects of its operations under the guise of ‘equity.’” As Hamilton outlines it, the conservative position is that the US is a colorblind nation, and attempts to deny this by unfairly applying DEI (Diversity, Equity, and Inclusion) initiatives amount to discrimination.



Stop the Coup 2025
a public education and mobilization campaign

Finally, the DOJ must pursue aggressive enforcement of all immigration laws.

STC 2025 Commentary: The entire Mandate for Leadership document judges the same behavior by a double standard for left and right, but Chapter 17 takes this rhetorical gaslighting to new heights.

While the right calls for book-banning and suppressing any curriculum that discusses the evils of slavery, Chapter 17 argues that it is actually the FBI that polices speech. Yet this chapter self-righteously calls for an end to censorship: “The First Amendment prohibits it. The United States is the world’s last best hope for self-government, and its survival relies on the ability of our people to have healthy debate free from government intervention and censorship.”

The same kind of double standard condemns what Hamilton calls the “politicization” of the DOJ -- but plans to combat this by a vast expansion in the cadre of political appointees whose goal is to carry out the Mandate for Leadership. Hamilton accuses the Biden administration of “brazenly partisan and ideologically driven prosecution of an Administration’s perceived political enemies,” while simultaneously laying out plans to launch a thorough course of revenge if a conservative president is elected. The double standard preserves religious freedom for those who oppose abortion, but not for those who support it. They cite the constitution, but apply it differently: “It is black letter law that no official ‘can prescribe what shall be orthodox...or force citizens to confess by word or act their faith therein.’”

Chapter 17 - Key Points:

- ✓ Replace career civil servants with a “vast expansion” of political appointees
- ✓ Overturn the current “politicization and weaponization” of the DOJ
- ✓ Enact complete review of FBI
- ✓ Denial of Russian election interference and the constant flow of misinformation
- ✓ Secure the border and rigorously enforce all immigration laws
- ✓ Aid the Department of Homeland Security in pursuing criminal aliens
- ✓ Ban all DEI initiatives as “racist”
- ✓ Prosecute voter fraud (transfer this responsibility to the criminal division)
- ✓ Halt investigations of any group engaging in lawful and, in many cases, constitutionally protected activity

Chapter 18. Department of Labor and Related

Agencies. **Author:** Jonathan Berry, *former acting Assistant Secretary for Policy at the US Department of Labor. At the US Department of Justice, he assisted with the nominations of Justice Neil Gorsuch and dozens of other judges. He previously served as Chief Counsel for the Trump transition and earlier clerked for Associate Justice Samuel Alito and Judge Jerry Smith of the US Court of Appeals for the Fifth Circuit.*



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a public education and mobilization campaign

Berry sees the mission of the Department of Labor (DOL) as supporting the traditional nuclear family: “At the heart of *The Conservative Promise* is the resolve to reclaim the role of each American worker as the protagonist in his or her own life and to restore the family as the centerpiece of American life. The role that labor policy plays in that promise is twofold: Give workers the support they need for rewarding, well-paying, and self-driven careers, and restore the family-supporting job as the centerpiece of the American economy. The Judeo-Christian tradition, stretching back to Genesis, has always recognized fruitful work as integral to human dignity, as service to God, neighbor, and family.”

Chapter 18 outlines a plan to first integrate a conservative, religious vision of the family into every aspect of all agencies that come under the DOL umbrella: Equal Employment Opportunity Commission (EEOC); National Labor Relations Board (NLRB); National Mediation Board (NMB); Federal Mediation and Conciliation Service (FMCS); and Pension Benefit Guaranty Corporation (PBGC). The secondary goal of this reorganization is to ease regulations that Berry argues are stifling small businesses (environmental, employment, and especially anti-discrimination rules).

As in all the chapters of the *Mandate for Leadership*, the reorganization would be accomplished by replacing career civil servants with political appointees whose loyalty is to the president.

The proposed changes fall under four headings:

DEI

- ✓ Any requirement for “racial equity” regulations should be rescinded; “racial equity” is a form of discrimination, since it relies on racial classifications and concepts drawn from Critical Race Theory. Thus, any collection of data that could be used in “disparate impact” lawsuits should immediately be halted
- ✓ Any regulations based on “novel anti-discrimination theories (such as sexual orientation and gender identity theories)” should be rescinded by eliminating EO 11246
- ✓ The legal concept of sex discrimination should no longer cover sexuality, gender identity, transgender status, and sex characteristics in any area other than hiring or firing
- ✓ Sex should be recognized as a biological binary category only

Family

- ✓ “We must replace ‘woke’ nonsense with a healthy vision of the role of labor policy in our society, starting with the American family”
- ✓ The DOL should promote regulations that prioritize traditional families by providing accommodations for pregnancy and childcare (but not abortion)
- ✓ All regulations that support abortion should be rescinded

Religion

- ✓ Religious employers, employees, and institutions should be exempt from anti-discrimination policies



Stop the Coup 2025

a public education and mobilization campaign

- ✓ “Sabbath Rest. God ordained the Sabbath as a day of rest, and until very recently the Judeo-Christian tradition sought to honor that mandate by moral and legal regulation of work on that day. Moreover, a shared day off makes it possible for families and communities to enjoy time off together, rather than as atomized individuals, and provides a healthier cadence of life for everyone. Unfortunately, that communal day of rest has eroded under the pressures of consumerism and secularism, especially for low-income workers”

Business Regulations

- ✓ Small businesses in general should be exempt from burdensome bureaucracy, such as environmental regulations
- ✓ Congress should be encouraged to pass the “Worker’s Choice” Act (H.R. 8442), which would dilute the power of unions
- ✓ Work visas for immigrants should be greatly reduced to prioritize hiring of Americans
- ✓ Much of the administration of business regulations and unemployment benefits should be transferred to the states, who could adjust it as necessary

STC 2025 Commentary: In Berry’s vision for a reorganized Department of Labor, there is no distinction at all between religion and government: the DOL would simply become a politicized extension of evangelical Christian doctrine. All policy would be reshaped to promote only the traditional, Christian, conservative vision of the nuclear family, based on a strict definition of sex as a binary category. Sexuality and gender identity issues would no longer be protected.

In addition, protections for racial categories would be eliminated (since, in a position that reoccurs throughout this document, the authors argue that any racial categorization is inherently discriminatory, and no reparative actions to mitigate past injustice should be permitted).

The second aspect of the reorganization plan would be to enact the familiar conservative free-market concept of deregulation: ease all regulations that might impede small businesses, exempting them from current environmental and anti-discrimination regulations.

Chapter 18 - Key Points:

- ✓ All labor regulations would prioritize traditional, Christian families only
- ✓ Protections for LGBTQ+ employees would be eliminated
- ✓ The impact of race could no longer be considered in discrimination cases
- ✓ Regulations to protect the environment would be reduced

Chapter 19. Department of Transportation. Author: Diana Furchtgott-Roth, former Deputy Assistant Secretary for Research and Technology at the US Department of Transportation. She worked in senior roles in the White House under Presidents



Stop the Coup 2025
a public education and mobilization campaign

Ronald Reagan, George H.W. Bush, and George W. Bush, where she was Chief of Staff of the Council of Economic Advisers.

Chapter 19 focuses on the importance of all forms of transportation to American prosperity and the economy in general. As Furchtgott-Roth puts it, America needs transportation that is “abundant and affordable as well as dignified, accessible, and family friendly.” The Department of Transportation (DOT) is responsible for transit systems and roadways and infrastructure, highway safety, aviation, air traffic control, railroads, maritime transportation (US Merchant Marine).

Unfortunately, as she describes it, the DOT has evolved from regulating forms of transportation to becoming involved in planning, developing, and building them. These roles, she argues, are best left to the private sector: private companies can charge for transportation and use the money for innovation. At the very least, federal money should be shifted to the states, who know best what their local needs are.

Current regulations have not kept up with new technologies (e.g., drones, driverless cars), and the DOT has not imagined ways to integrate these new technologies into the current system. Instead, the Biden administration has pushed electric vehicles and invested in mass transit projects that are no longer needed due to changing commuter travel patterns after the COVID-19 pandemic. She argues that the term “public transit” should be expanded to include “new micromobility solutions, ridesharing, and a possible future that includes autonomous vehicles” among mobility options: “public transit” would then refer to “transit provided for the public rather than transit provided by a public municipality.”

Furchtgott-Roth further proposes a streamlining of the department (e.g., moving the Merchant Marine to the DHS or DOD), and focuses on deregulation, private sector involvement (or at least public/private partnerships), and shifting money and responsibility to the states. For example, she suggests that fuel economy regulations placed on traditional cars (for environmental reasons) have driven up prices, causing more Americans to drive unsafe, older cars; easing those regulations would bring down prices. Deregulation of airlines would also allow for more competition and thus lower prices.

Furchtgott-Roth concludes that the role of the DOT should be to make travel easier and less expensive, to keep the US economically competitive.

STC 2025 Commentary: This chapter echoes the familiar conservative call for deregulation, moving federal responsibilities to the states or the private sector, and abandoning concerns about climate change. The writer assumes that free-market policies would produce innovation and better products. If followed, these proposals would, however, further undercut viable forms of public transit on which many depend -- particularly those in urban areas and those who cannot afford personal cars. The proposals would increase US dependence on fossil fuels, and exacerbate environmental problems.

Chapter 19 - Key Points:

- ✓ Increased dependence on fossil fuel



Stop the Coup 2025

a public education and mobilization campaign

- ✓ Change concepts of “public transit” away from current “transit provided by a public municipality” to “transit provided for the public” -- opening door to private sector
- ✓ Expand public transit to include “micromobility” solutions, ridesharing, possible future autonomous vehicles
- ✓ Less federal support for large infrastructure projects
- ✓ Deregulation of major industries (especially airlines)

Chapter 20. Department of Veterans Affairs. Author: Brooks D. Tucker, with input from Darin Selnick, Paul R. Lawrence, and Christopher Anderson. Tucker is former Acting Chief of Staff, US Department of Veterans Affairs (VA); former Assistant Secretary for Congressional and Legislative Affairs at the VA; and a former Marine Corps Lt. Col. He helped craft the policy framework for President-elect Trump’s transition team.

Tucker opens his review and call for reforms of the VA by stating the agency was in poor shape back in 2014, and improved by 2020 by adopting a “Veteran-centric” approach to the VA’s mission providing for veterans’ needs and experiences in the key areas of health care, benefits, and memorial affairs. While reviewing management challenges facing the sprawling VA, his chief focus for reform is a call to eliminate social policies related to the promotion of gender, equity, and inclusivity -- or the “Left’s pernicious trend of abusing the role of government to further its own agenda.”

The VA currently serves 18 million veterans nationally; of these 6.4 million of 9.1 million enrolled use the VA for health care; the remainder use employer-sponsored plans, Tricare, Medicare, and Medicaid. The VA operates 172 inpatient VA Medical Centers (VAMCs), which are an average of 60 years old, and 1,113 Community Based Outpatient Clinics (CBOCs), which are newer facilities. The VA also manages a Community Care Network (CCN) through contracts with Optum and TriWest, third-party health care administrators.

Meanwhile, VA benefits are administered through 56 Regional Benefits Offices (RBOs) and hundreds of satellite sites around the country.

While crediting the Biden administration for maintaining good VA governance practices, Tucker critiques its failure to maintain “a genuine ‘Veteran-centric’ philosophy, with respect to health care delivery and its ‘bias’ in expanding the unionized federal employee workforce.” He sharply criticizes the VA’s policy of “social equity and inclusion” in departmental policy discussions that, he says, affect only a small number of veterans -- a veiled reference to LGBTQ+ soldiers, particularly transgender veterans. He aims vitriol at the VA’s provision of legal abortion “for the first time,” calling it part of “the grotesque culture of violence against the child in the womb,” and argues that the VA lacks the legal authority and clinical competency to do perform the medical procedure.

Tucker cites a persistent lag in processing and delivering timely benefits to veterans as a problem that the next administration will inherit, given a current backlog of cases that multiplied



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over decades as more attention was given to the long-term health harms to veterans caused by their field exposure to defoliant chemicals and airborne toxins, including Agent Orange during Vietnam and newer chemical weapons since then. The VA has chronically struggled to hire enough people to process new disability claims and adjudicate appeals, Tucker states. Although VA budgets are high, the agency must improve its service delivery to veterans.

Proposed reforms include:

- ✓ Rescind all VA clinical policy directives deemed contrary to principles of conservative governance, starting with abortion services and gender reassignment surgery
- ✓ Focus on shifting demographics, regional migration and needs of older versus new veterans
- ✓ Restore and implement Trump administration VA MISSION policy to expand health care delivery to more third-party, non-VA private health care providers that Biden administration decreased; expand Community Based Outpatient Clinics (CBOCs)
- ✓ Adopt a Veteran's Bill of Rights and codify VA MISSION policy to clarify veterans benefits and support greater access to private health providers by revising Community Care regulations (particularly Sections 101, 103, 104, 152, 161)
- ✓ Encourage VA Medical Centers to seek out relevant academic and private sector input to improve patient experience
- ✓ In fiscal oversight, conduct an independent audit of the VA like the 2018 DoD
- ✓ Review rising infrastructure costs and VA facility use to align with needs
- ✓ Extend the Under Secretary for Health's term to five years and consider appointing them to a second five-year term "to protect the USH from political transition"
- ✓ Streamline the process for reviewing disability claims, improve management, hire more private companies to help, develop a new pilot "Express 30" commitment to review claims in 30 days
- ✓ Upgrade the VA's performance by embracing technology and tech training for personnel
- ✓ Hire more veterans and their spouses to work in the VA
- ✓ Eliminate/rescind all Biden VA policies on Day One of a new administration
- ✓ On Day One, transfer all executive-level appointees to ensure political control of the VA
- ✓ Hire more Limited Term Appointment Senior Executive Service positions (up to 3 years)
- ✓ Be prepared to enact labor reforms quickly and anticipate the legal challenges
- ✓ Sunset the Office of Accountability and Whistleblower Protection (OAWP)
- ✓ De-link the Human Resources Administration and Office of Security and Preparedness (OSP) as their missions are too different

STC 2025 Commentary: Tucker has limited criticism of the Biden administration's governance of the VA; his discussion suggests a grudging respect for the present management of the VA, apart from chronic problems like slowness, inadequate hiring, and inheritance of a growing caseload of claims related to exposure to toxins. His opposition to "Left" policies on gender, diversity and equity, and to abortion and gender assignment surgery services for veterans are in line with other authors and Project 2025's overall goal of eradicating gender, DEI and



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diversity reforms from government policies. His call to increase use of private non-VA providers, clinics, and companies to help assess VA disability claims reflect a conservative position that favors shifting federal dollars and authority to the private sector, where possible.

Chapter 20 - Key Points:

- ✓ On Day One, eliminate Biden VA policies new administration
- ✓ On Day One, remove all senior Biden appointees/federal appointees
- ✓ Act early to be ready for Day One labor reform implementation and legal challenges
- ✓ Eliminate VA support for abortion, gender reassignment surgery, diversity initiatives, and align all policies with conservative pro-life values
- ✓ Increase private sector delivery of VA health services, administration of benefits

SECTION FOUR. THE ECONOMY

In the first lines of an introduction to reforms they plan to implement to reshape America's economy, Project 2025's authors state the problem they want to fix: "For several decades, establishment 'elites' have failed the citizenry by refusing to secure the border, outsourcing manufacturing to China and elsewhere, spending recklessly, regulating constantly, and generally controlling the country from the top down rather than letting it flourish from the bottom up." That said, they disagree on how to achieve this, apart from a shared view that a limited federal government is best to support their vision of an unfettered free market economy as they key to building prosperity for more Americans.

Chapter 26 co-author Kent Lassman, president of the Competitive Enterprise Institute, wants to expand free trade by reducing the government's role in regulating large corporations in particular, and increase domestic manufacturing, to make American businesses more competitive in global markets, and less reliant on outsourcing of manufacturing and importing of cheaper goods from China and elsewhere. He would cut government spending, and remove "Leftist" policies that "push climate change and equity-based activism" which represent hurdles to doing business. Lassman suggests the US lower or repeal tariffs -- including eliminating "the destructive Trump-Biden tariffs" -- to make goods more affordable for Americans.

Chapter 26 co-author Peter Navarro, former White House director of trade and manufacturing policy, sees the problem of global competition differently. He suggests tackling the World Trade Organization's (WTO) "most favored nation" rules that "encourage our trade partners to adopt high tariffs, which lead to our "chronic" trade deficits and make us "the globe's biggest trade loser and victim of unfair, unbalanced, and non-reciprocal trade." He suggests America's trade policy be guided "by 'the principle of reciprocity,' in which the US coaxes other countries to lower their trade barriers if possible and raise America's as necessary. America should 'decouple' its economy from China." He and Lassman disagree on their view of trade deficits and how they impact our economy.



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In this section, China -- and US trade policies with China -- get a lion's share of attention as the major economic rival. Argues Navarro: "...our current trade policy enriches our allies and adversaries while hurting us, weakens our industrial base while strengthening China's, and shortchanges 'Main Street manufacturers and workers.' Such non-reciprocal 'free' trade is slowly undermining our capabilities and our freedom."

Among targets for reform, authors in this section cite the Commerce Department and the Census Bureau, which, they feel, "need far more political leadership" so that the Commerce Department implements the president's agenda, and the Bureau of Economic Affairs, housed at Commerce, "conducts its statistical analysis in a consistent and objective manner" to make economic data easier to access and assess. They also call for reforming tax policy, "primarily by reducing marginal tax rates, reducing the cost of capital, and broadening the tax base to eliminate tax-induced economic distortions by eliminating special-interest tax credits, deductions, and exclusions." They also want to "promote tax competition rather than supporting an international tax cartel."

Conservatives plan to target the Internal Revenue Services to reduce its "intrusiveness" on American business, and take special aim at the Small Business Administration, which is accused of "waste, fraud, and mismanagement" and guilty of "mission creep." Moreover, its "initiatives aimed at 'inclusivity' are in fact creating exclusivity and stringent selectivity in deciding what types of small businesses and entities can use SBA programs," state the authors.

The most radical proposal is to get rid of the Federal Reserve entirely, replace it with "free banking," whereby "neither interest rates nor the supply of money" would be "controlled by government." That would, they argue, produce a "stable and sound" currency and a "strong" financial system, "while allowing lending to flourish." Alternatively, one author proposes, the next Administration should "consider the feasibility of a return to the gold standard."

Chapter 21. Department of Commerce. Author: Thomas F. Gilman, Director of ACLJ Action, Chairman of Torn-gat Metals; former Assistant Secretary of Commerce for Administration and Chief Financial Officer, US Dept. of Commerce in the Trump administration. Former CEO, Chrysler Corporation. Chapter input from James Rockas, Nazak Nikakhtar, Louis Heinzer, Robert Burkett, Iain Murray, Michael Gonzalez, David Legates, and Kristen Eichamer, among others.

Gilman starts his call to reshape the Department of Commerce (DOC) by stating it "has suffered from decades of regulatory capture, ideological drift, and lack of focus." Yet, the DOC, he feels, is actually a critical lever of the economy, "central to any plan to reverse the precipitous economic decline sparked by the Biden Administration and to counter Communist China." He calls for tackling red tape and bloat, with the goal of "consolidation, elimination, or privatization" of bureaus or roles within DOC, to improve its operations and philosophical alignment with conservative principles.



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Key proposed reforms include:

- ✓ Streamline the International Trade Administration (ITA) and parts of the Bureau of Industry and Security (BIS) and move to the Office of the US Trade Representative (USTR), along with the Development Finance Corporation; the US Trade and Development Agency; the Export-Import Bank; and other trade-related programs and consider whether these programs should exist
- ✓ Consolidate or eliminate the Economic Development Administration's grant programs, which are duplicative and overlapping
- ✓ Consolidate the Bureau of Economic Analysis and Census Bureau
- ✓ Consolidate the Department of Labor's Bureau of Labor Statistics into a more manageable, focused, and efficient statistical agency
- ✓ Make the US Patent and Trademark Office (USPTO) into performance-based organization under the Office of Management and Budget (OMB); alternatively, consolidate the USPTO with the National Institute of Standards and Technology (NIST) in a new US Office of Patents, Trademarks, and Standards. Eliminate or move non-mission-critical research functions to other, more focused, federal agencies
- ✓ Dismantle the National Oceanographic and Atmospheric Administration (NOAA) or transfer its functions to other agencies; control of states or territories, or privatize

Other:

Office of the Secretary

- ✓ Do more to digitize and modernize the department's processes to free resources for secretarial and presidential priorities
- ✓ Fully staff OS with political appointees; send all existing detailees back to their home bureaus on Day One, to execute the president's agenda
- ✓ Immediately install political leadership at the Office of the Chief Financial Officer (CFO) and Assistant Secretary for Administration (ASA); ensure funds align with Administration priorities
- ✓ Mandate political appointees to communicate with external partners and career staff at every stage of budget and appropriations process
- ✓ Review and/or abolish advisory groups to DOC hostile to conservative principles; mandate Federal Advisory Committee Act (FACA) compliance

International Trade Association

- ✓ Counter the malign influence of China and other US adversaries
- ✓ Enforce agreements vigorously and defend against trade violations
- ✓ Secure access to critical supply chains and technology
- ✓ Enable the private sector to drive innovation and remain globally competitive
- ✓ Quickly fill Assistant Secretary and Deputy Assistant Secretary positions by appointees



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Enforcement and Compliance

- ✓ Re-establish and expand suspended in-person pandemic-related verifications, particularly regarding the People's Republic of China. Ensure that verifications are rigorous
- ✓ Implement advanced analytics and artificial intelligence to identify opportunities for self-initiation, detect circumvention, and prevent bad actors from gaming the system
- ✓ Work with Customs and Border Protection (CBP) and other relevant agencies to address circumvention and duty evasion, and promote policies that encourage full duty collection
- ✓ Work with CBP, the DOJ, the DOT, and relevant agencies to aggressively enforce import duty payments; review, consider policy changes to reduce uncollected duties
- ✓ Set a policy and fair AD/CVD proceedings process for companies with high US imports
- ✓ Revive the China-specific non-market economy unit, and provide transparency in the surrogate country list development process
- ✓ Develop a new methodology to determine normal values in Chinese anti-dumping cases
- ✓ Support steel and aluminum market analysis and import monitoring crucial to US defense industrial base and health of global manufacturing

Industry and Analysis

- ✓ Permanently restructure I&A to do supply-chain analysis for the US to identify market vulnerabilities
- ✓ Establish permanent standing teams of loyalists and trusted career staff to spur action on:
 - Strategic decoupling from China; defense industrial base strength; critical supply chains; emerging technologies

Global Markets (GM) and the US and Foreign Commercial Service (CS)

- ✓ Strategically overhaul GM and CS resource allocation to:
 - Counter the malign influence of adversaries, particularly China; foster US innovation; maintain access to critical supply chains and technology; address market hurdles for US companies; untapped export market size and expansion
- ✓ Promote the Advocacy Center and SelectUSA as low-cost tools to drive large-scale export transactions and foreign direct investment (FDI)

Bureau of Industry and Security

- ✓ Strengthen US rules on technology transfer; reverse "Export Control Reform" process to loosen the Export Administration Regulations (EAR) governing exports of dual-use items
- ✓ Give lead authority to BIS's Under Secretary to resolve export license disputes
- ✓ Eliminate BIS's authority to overrule other agency votes; give NSA final vote, with Secretaries of Defense, State, Commerce, Energy
- ✓ Require quarterly BIS reporting of Automated Export System data to Congress

End-Use Checks

- ✓ Improve enforcement of export control violations by Export Enforcement officers



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- ✓ Deny export licenses to countries that do not permit adequate end-use checks

EAR policies

- ✓ Revise or reverse 2008 to 2016 EAR policies; tighten governing licenses to countries of concern
 - Reduce *de minimis* threshold for critical technologies from 25% to 10% or zero
 - Tighten technology transfer rules for foreign nationals from countries of concern
 - Tighten the definition of “fundamental research” to address exploitation of the open US university system by authoritarian governments
- ✓ Add more companies to the Entity List; do license review to stop exports to them
- ✓ Place export violators on the BIS Denied Persons List; they lose export privileges;
 - Have Department of Treasury sanction significant violations

Data Transfer and Apps Used for Surveillance

- ✓ Draft and implement an Executive Order (EO) based on the International Emergency Economic Powers Act to regulate and restrict exports of US persons’ data to countries of concern
- ✓ The EO should establish a framework for the types of personal data subject to export controls and licensing policy by country, and the BIS should implement the EO through regulations
- ✓ BIS should add to Entity List app providers such as WeChat and ByteDance/-TikTok; this would stop user app program updates and make companies non-operational in US

National Oceanic and Atmospheric Administration

- ✓ Break up and downsize agencies of NOAA that are main drivers of climate change alarm:
 - National Ocean Service; Oceanic and Atmospheric Research; National Environmental Satellite, Data and Information Service; National Marine Fisheries Service (NMFS); and Office of Marine and Aviation Operations and NOAA Corps
 - Consider outsourcing its functions to private commercial sector
- ✓ Review National Hurricane Center; National Environmental Satellite Service to require neutral data forecasts as related to climate change

On Streamline Fisheries Services

- ✓ Harmonize the Magnuson–Stevens Act with the National Marine Sanctuaries Act
- ✓ Withdraw the 30x30 Executive Order and associated America the Beautiful Initiative to stop closure of vast areas of the ocean to commercial activities, while offshore wind energy development hurts fisheries, ocean-based industries
- ✓ Modify the Regulations Implementing the Marine Mammal Protection and the Endangered Species Act; these harm fisheries, Native American subsistence activities
- ✓ Allow a NEPA Exemption for Fisheries Actions as additional requirements are onerous; have DOC and Environmental Quality collaborate on this
- ✓ Elevate the Office of Space Commerce to coordinate US commercial space policy



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Bureau of Economic Analysis and the Office of Undersecretary for Economic Affairs

- ✓ Make BEA an effective tool for data, data policy and analysis, and data management of BEA and Census Bureau to support GOP administration goals
- ✓ Do a feasibility study of merger of statistical agencies (Census Bureau, BEA, Department of Labor's Bureau of Labor Statistics, etc.) under one bureau to increase efficiency

Census Bureau

- ✓ Have Office of Personnel Management allocate more political appointee positions to the Census Bureau and align its work with conservative principles
- ✓ Actively engage with conservative groups to promote their response to decennial census
- ✓ Add a citizenship question (despite a finding that the Trump administration's addition of the citizenship question to the 2020 decennial census violated the Administrative Procedures Act, the Supreme Court held that the Secretary of Commerce has broad authority to do so, argues the author)
- ✓ Review any changes by Biden administration to data collection methods regarding race and ethnicity that may have bolstered progressive political agenda; coordinate with OMB
- ✓ After decennial census, review the American Communities Survey (ACS) to be sure questions are useful, not intrusive; work with HHS, Homeland Security, Labor on usage
- ✓ Plan for 2027 Economic Census, review data collection with other federal agencies
- ✓ Review Supplemental Poverty Measure; how data can help combat homelessness
- ✓ Abolish the National Advisory Committee on Racial, Ethnic, and Other Populations (NAC) to counter "leftwing activists...injecting racial and social-justice theory" into Census work

Economic Development Administration

- ✓ Abolish the EDA; reallocate funds to overlapping grants, or put decision-making under the Assistant Secretary's office to align with conservative agenda
- ✓ Invest in Opportunity Zones to incentivized private sector work in relief sector

Minority Business Development Agency

- ✓ Conservatives would prefer to abolish the MBDA; alternatively:
 - Make it a data and research clearinghouse for minority enterprises, policymakers
 - Conduct policy analysis "on the benefit of free markets...evils of socialism and Communism...destructive effect of taxes and regulations" on minority businesses
- ✓ Favor private sector over government action; public-private partnerships a middle ground

US Patent and Trademark Office

- ✓ Support ideologically aligned countries to help lead World Intellectual Property Organization



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- ✓ Oppose intellectual property waivers for cutting-edge technologies, including for COVID-19 vaccines and therapeutics through WTO agreements

National Institute of Standards and Technology

- ✓ Evaluate and consolidate the federal government's civilian research footprint
- ✓ Ensure any taxpayer-funded research is in line with conservative principles
- ✓ Privatize the Hollings Manufacturing Extension Partnership
- ✓ Transfer the Baldrige Performance Excellence Program to non-government control

National Telecommunications and Information Service

- ✓ Consolidate NTIS Tech Transfer and ROI initiatives.

National Telecommunications and Information Administration

- ✓ On broadband access policy, rapidly deploy 5G; review value of FirstNet
- ✓ Review and provide federal policy solutions to address big tech's censorship of speech
- ✓ Use former Trump administration's Information and Communications Technology and Services (ICTS) Executive Order as a new tool to eliminate threats to national security
- ✓ Start short-term leasing of federal spectrum while preserving federal agency use rights
- ✓ Push the Federal Communications Commission to make licensing decisions to support US dominance in the commercial space industry

STC 2025 Commentary: The main approach advocated by the author to tackle the DOC's perceived red tape and bloat is to privatize or outsource many of the functions and areas of responsibility of the DOC and to align existing policy with conservative principles. In the area of international trade, the goal is to promote policies and initiatives to decrease the Chinese market, including in areas of technology and communications, and promote America-first policies. Some of these are via Executive Orders or policies to try to punish foreign exporters of goods into the US.

On climate, the proposal to break up or decrease the role of key NOAA agencies that oversee environmental policy represents a serious attack on current environmental protections, with a goal of deregulation and opening up natural areas to private commercialization. Meanwhile, the push to add a citizenship question to the Census, a failed Trump effort, reflects an attack on immigrants, while the proposals related to minority businesses reflect an anti-diversity agenda. Short of abolishing the Minority Business Development Agency, conservatives hope to steer minority businesses to embrace their "no government, no taxes" philosophy.

Chapter 21 - Key Points:

- ✓ Reform the DOC by privatizing its functions and roles where possible
- ✓ Take actions to "counter the malign influence of China and other US adversaries."
 - Via the BIS, use the Entity List make Chinese app providers such as WeChat and ByteDance/TikTok non-operational in US
- ✓ Downsize NOAA agencies that raise alarms about climate change



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- ✓ On Census, add a citizenship question, despite a 2020 finding that this violated the Administrative Procedures Act, and
- ✓ Promote the benefits of free trade, no taxes and deregulation, for minority businesses

Chapter 22. Department of the Treasury. **William L. Walton, Stephen Moore, David R. Burton.** *Walton is Chairman of the Resolute Protector Foundation, host of Bill Walton Show, and former Agency Action Leader for all federal economic agencies for 2016, 2017 President-elect Trump transition team; also former CEO, Allied Capital Corporation; board member of The Heritage Foundation. Moore is a conservative columnist and Fox News analyst; senior economist, FreedomWorks; Distinguished Fellow, The Heritage Foundation. Burton is Senior Fellow in Economic Policy at the Thomas A. Roe Institute for Economic Policy Studies at The Heritage Foundation, former General Counsel at the National Small Business Association and at the New England Machinery; former manager US Chamber of Commerce.*

The authors call for major reforms of the Department of the Treasury (USDT), which serves as an executive-level national treasury and finance department to help guide economic growth. The main goals of the next GOP administration are, they stated, to reduce regulatory hurdles that reduce living standard and “endanger prosperity;” reduce regulatory compliance, promote fiscal responsibility and the international competitiveness of US businesses, and finally, to better respect the American people’s due process and privacy rights.

The tools to do this are via USDT executive actions (treasure orders, directives), reorganizing the department, promoting policies in Congress aligned with the president’s goals, and similarly promote actions with the conservative agenda in international organizations and treaties.

Priority goals include:

- ✓ “Reversal of the racist ‘equity’ agenda of the Biden Administration”
- ✓ “Reversal of the economically destructive and ineffective climate-related financial-risk agenda of the Biden Administration

The authors believe US financial affairs have “seldom been in worse condition,” with a national debt that increased by over \$4 trillion in Biden’s first two years of office, and “the worst inflation in four decades.” They cite a \$6K drop in average earnings and \$20K drop in 401(k) pension savings for Americans in Biden’s first two years of office as evidence. The main blame for this is the leadership of Treasury Secretary Janet Yellen and her team, who pursued adoption of equity and climate change policies as one of the USTD’s top five priorities -- “a mission drift into a ‘woke’ agenda.”

In international affairs and financial policy, they call for withdrawal from the World Bank, and the International Monetary Fund and adding the Organization for Economic



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Development into the mix of global economic institutions “run by global elites” who seek to hamper free enterprise.

The proposals to eliminate equity, CRT and DEI, and accessibility provisions, contain extra calls for punitive actions. The authors call for grilling Treasury department employees who engaged in CRT and DEI, and accessibility practices or implemented these policies to make sure they fully end, firing CRT and DEI advisory committee members, and, looking ahead, firing employees who engage in CRT and DEI practices.

Specific Actions / Reforms proposed:

Tax Policy

- ✓ Simplify tax policy: reduce marginal tax rates and the cost of capital; broaden the tax base; eliminate special-interest tax credits, deductions, and exclusions
- ✓ Promote tax competition rather than supporting an international tax cartel

Tax System -- carry out reforms to reflect these principles:

- ✓ Raise revenue necessary to fund a limited government for constitutionally appropriate activities
- ✓ Minimize interference with free market and free enterprise and the cost to taxpayers of tax compliance and administration
- ✓ Minimize the system’s adverse impact on the family and core civil society institutions
- ✓ Apply the tax system consistently -- with special privileges for none

Tax Code

- ✓ Enact a simple two-rate individual tax system of 15 percent and 30 percent to eliminate most deductions, credits, and exclusions
 - The 30 percent bracket should begin at, or near, the Social Security wage base to ensure the combined income and payroll tax structure acts as a nearly flat tax on wage income beyond the standard deduction
- ✓ Reduce corporate income tax rate to 18 percent
- ✓ Tax capital gains and qualified dividends at 15 percent
 - The combined corporate income tax combined with the capital gains or qualified dividends tax rate would be roughly equal to the top individual income tax rate
- ✓ Allow immediate expensing for capital expenditures and index capital gains taxes for inflation
- ✓ Repeal all tax increases passed as part of the Inflation Reduction Act, including the book minimum tax, stock buyback excise tax, coal excise tax, Superfund tax, and excise taxes on drug manufacturers required to comply with Medicare price controls
- ✓ Push legislation to fully repeal recently passed tax code subsidies including credits and tax breaks for green energy companies in Subtitle D of the Inflation Reduction Act

Universal Savings Accounts (USAs)



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- ✓ Allow all taxpayers to contribute up to \$15,000 (adjusted for inflation) of post-tax earnings into USAs, and make tax treatment of USAs comparable to Roth IRAs
- ✓ Gains from investments in USAs would be non-taxable and could be withdrawn at any time for any purpose

Entrepreneurship

- ✓ Increase limit of business loss to \$500,000. Allow businesses to fully carry forward net operating losses and eliminate or reduce layers of taxes on investment and capital
- ✓ Eliminate the net investment income surtax and the base erosion anti-abuse tax
- ✓ Reduce the estate and gift tax to no higher than 20 percent
- ✓ Make permanent the 2017 tax bill's temporary increase in the exemption amount from \$5.5 million to \$12.9 million (adjusted for inflation)
- ✓ Reduce the tax on global intangible low-taxed income to no higher than 12.5 percent
 - Reduce the 20 percent haircut on related foreign tax credits
- ✓ Permanently repeal all non-business tax deductions and exemptions that were temporarily suspended by the 2017 tax bill (including the bicycle commuting expense exclusion, non-military moving expense and miscellaneous itemized deductions)
- ✓ Fully repeal the individual state and local tax deduction, which was temporarily capped at \$10,000; repeal educational expense deductions
- ✓ Repeal special business tax preferences, including for energy-efficient commercial properties

Wage vs. benefits

- ✓ Set a meaningful cap (limit \$12,000 per year, per full-time equivalent employee, preferably lower) on untaxed benefits that employers can claim as deductions
 - Employee benefit expenses other than tax-deferred retirement account contributions should count toward the limit
 - Tax-deferred retirement contributions by employers should not count toward this limit insofar as they are fully taxable upon distribution
 - Only a percentage of Health Savings Accounts (HSA) contributions (which are not taxed upon withdrawal) should count toward the limit
 - The limitation on benefit deductions should not be indexed to increase with inflation
 - Employers should also be denied deductions for health insurance and other benefits provided to employee dependents if the dependents are aged 23 or older

Fundamental Tax Reform Ideas

- ✓ Consider possible forms that a consumption tax could take, including a national sales tax, a business transfer tax, a Hall-Rabushka flat tax, or a cash flow tax
- ✓ Support legislation to establish a supermajority vote (three-fifths vote threshold) in Congress to raise income or corporate tax rates and create a protective wall for the new rate structure



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- ✓ Oppose a global minimum corporate tax -- “an attempt to create a global tax cartel to quash tax competition and to increase the tax burden globally”
- ✓ End US support from the Organization for Economic Co-operation and Development (OECD) as it is “little more than a taxpayer-funded left-wing think tank and lobbying organization.”

Tax Administration

- ✓ Reverse the Inflation Reduction Act which included monies to possibly double the IRS workforce
- ✓ Staunchly oppose required reporting of all business and personal bank accounts with more than \$600, collection of taxpayer ID numbers, filing of revised Form 1099-K for affected payees

IRS Management

- ✓ Increase the number of IR presidential appointments subject to Senate confirmation, and those not subject to Senate confirmation
 - Ensure these positions are presidential appointees: the Deputy Commissioner for Services and Enforcement; the Deputy Commissioner for Operations Support; the National Taxpayer Advocate; the Commissioner of the Wage and Investment Division; the Commissioner of the Large Business and International Division; the Commissioner of the Small Business Self-Employed Division; the Commissioner of the Tax Exempt and Government Entities Division

Information Technology

- ✓ Establish the Deputy Commissioner for Operations Support (with strong IT management skills) as a presidential appointment; appointment by the president or IRS Commissioner
 - Replace subordinates to Deputy Commissioner of Operations Support
 - Establish an oversight board of private sector IT experts with authority to review

Office of Taxpayer Advocate

- ✓ Increase resources of this office to better assist taxpayers facing “wrongful” IRS actions
 - Increase National Taxpayer Advocate budget by 20%
- ✓ Close the Office of Equity, Diversity, and Inclusion

International Affairs

- ✓ Withdraw from the IMF and World Bank
- ✓ Withdraw the Protocol Amending the Convention on Mutual Administrative Assistance in Tax Matters from consideration by the Senate
- ✓ Oppose the multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information

Fiscal Responsibility



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- ✓ Make balancing the federal budget a “mission-central” objective
- ✓ Treasury should lock in current relatively low interest rates by issuing longer duration bonds, and consider creating a 50-year treasury bill
- ✓ Provide Americans with an annual USG financial statement to promote transparency
 - Include individual family’s pro-rata share of the debt based on family size

International Competitiveness

- ✓ Advance US interests in international financial institutions (IFIs) by leaving those that do not advance US GOP agenda; increase or decrease US ownership level as leverage tool
- ✓ Hire a large cadre of US professionals and contracts to IFIs as a condition of US funding

China and Geopolitical Interests

- ✓ Realign priorities, mitigation, enforcement policies of the interagency Committee on Foreign Investment in the United States (CFIUS) to meet foreign policy threats, including China
 - Make DOD a CFIUS co-chair with Treasury to invite fuller DOD, IC, DOS participation
- ✓ Close the loophole on greenfield investments; require CFIUS review of such US-based, Chinese-controlled, entities to assess possible US national, economic security risks
- ✓ Consider creation of a jointly run Treasury-DOD school of financial warfare with specially trained experts “to prosecute international defensive and offensive objectives”
- ✓ Seriously evaluate US foreign direct investment in China; tighten reporting, oversight

Improved Financial Regulation

- ✓ Support legislation to merge the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the National Credit Union Administration, and Federal Reserve’s non-monetary supervisory and regulatory functions -- to streamline the system
- ✓ Policymakers should create new charters for financial firms that eliminate activity restrictions and reduce regulations in return for straightforward higher equity or risk-retention standards

Dodd-Frank revisions

- ✓ Repeal Title I, Title II, Title VIII of Dodd-Frank Act regulating financial firm activities
- ✓ Wind down Fannie Mae and Freddie Mac (both GSEs) in an orderly manner
- ✓ Privatize the Common Securitization Platform and make broadly available
- ✓ Redefine mission of Federal Housing Administration and Government National Mortgage Association (“Ginnie Mae”); open housing finance market to private investment

Anti-Money Laundering and Beneficial Ownership Reporting Reform

- ✓ Congress should require the Financial Crimes Enforcement Network and Government Accountability Office to evaluate their operations and improve efficacy
 - FinCEN must disaggregate its reporting data to be useful



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- Congress should repeal the Corporate Transparency Act
- FinCEN should withdraw its “overbroad” beneficial ownership reporting rule

Equity

- ✓ Eliminate the offices of Counselor for Racial Equity, Advisory Committee on Racial Equity, Diversity, Equity, Inclusion, and Accessibility; end all CRT, DEI practices
 - Identify every Treasury official who participated in DEI initiatives and interview them to determine the scope and nature of these initiatives and to ensure they end
 - Make public immediately all communications relating to the work of the Treasury’s critical race theory and DEI initiatives
 - Treat the participation in any CRT or DEI initiative, without objecting on constitutional or moral grounds, as per se grounds for termination of employment
 - Expose and make public all training materials and initiatives designed to single out any race, ethnicity, or sex for special treatment

Climate-Related Financial Risk

- ✓ Eliminate the Biden “Climate Hub Office” that coordinates Treasury’s work on financing of climate mitigation and climate adaptation
- ✓ Withdraw the US from the UN Framework Convention on Climate Change and the Paris Agreement
- ✓ Consider returning in-house law enforcement capacity to the US Coast Guard and the Bureau of Alcohol, Tobacco, Firearms, and Explosives to boost border economic security
- ✓ Eliminate the US Trade and Development Agency (USTDA); reduce trade tariffs; support private sector activities
- ✓ Free more foreign dollars spent on US exports vs. US treasury bonds to boost economy

STC 2025 Commentary: Many reforms proposed in this chapter are familiar extreme conservative and “America First” positions that support removing government regulation of businesses to allow a completely free market and free enterprise to fuel the US economy. They would expose US consumers and a global market to the risk of greater fraud and products linked to unregulated business practices, and far less transparency, leaving companies to decide how much they want to disclose to the public about company practices, and less public oversight.

The call for eliminating financial policies that support climate policies echo those of other Project 2025 authors. Climate activists who strongly disagree have released myriad reports suggesting far greater economic harms will impact the US and world economies and lives of billions due to the negative impacts of climate change on food production, economic and trade development, and other sectors.

Finally, the reforms related to critical race theory, DEI, and accessibility, expose the additional goal of punishing employees who fail to fall in line with Project 2025’s anti-gender, anti-diversity, and here, anti-disability rights agenda. It’s not enough to reverse or end policies that support diversity, whether in gender, or racial equality, or physical ability, but, á la McCarthy era, to threaten, intimidate and silence employees who might support them. Looking ahead, it’s



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not a stretch to see how employees who are women, LGTBQ+, people of color, or differently abled are inherently and negatively targeted by these reforms.

Chapter 22 -- Key Points

- ✓ Reverse US government financial policies that promote climate protection, equity, diversity, accessibility
- ✓ Withdraw from the World Bank and IMF; evaluate USG participation in IFIs
- ✓ Simplify the Tax System and Tax Code; decrease IRS enforcement of taxpayers
- ✓ Repeal Title I, Title II, Title VIII of Dodd–Frank Act regulating financial firm activities
- ✓ Wind down Fannie Mae and Freddie Mac; boost private investment in housing market

Chapter 23. Export-Import Bank.

- **The Export-Import Bank Should Be Abolished.** Author *Veronique de Rugy is the George Gibbs Chair in Political Economy and Senior Research Fellow at the Mercatus Center at George Mason University and a nationally syndicated columnist, and blogger for National Review Online's The Corner.*
- **The Case for the Export-Import Bank.** Author *Jennifer Hazelton is a former US Congress communications director, and award-winning Fox News Channel and CNN news journalist. She is a former senior strategic consultant for the DOD in Industrial Base Policy; and had senior positions at USAID, the Export-Import Bank of the US, and the State Department.*

In this chapter, two conservative authors take different views of the value of the Export-Import Bank, or EXIM [*also The Bank*], a federal agency established in 1934. The EXIM was created to provide export subsidies through taxpayer-backed financing to private exporting corporations, as well as to foreign companies buying US exports, for the purpose of promoting American exports, creating jobs, supporting small businesses, improving US competitiveness, and protecting US taxpayers. (In plain language, an export subsidy is direct or indirect government payment or targeted tax cut given to a firm, industry, or business to help its export performance.) The Bank offers loan guarantees, working capital guarantees, direct loans, and export-credit insurance.

Political economist de Rugy takes a dim view of the EXIM, calling for it to be abolished, because, she writes, it is “a protectionist agency that picks winners and losers in the market by providing political privileges to firms that are already well financed. By doing so, it risks taxpayer funds as it stymies economic growth.” In 2015, The Bank became incapacitated and has not recovered, she argues. She calls it an example of “government-granted privilege” that doesn’t create or maintain jobs, or really promote exports -- despite its original mission. In her view,



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subsidy-boosted exports do not boost economic growth. It doesn't support small businesses and is not a good deal for taxpayers, she argues.

Most importantly, the EXIM is not preventing China from dominating the global market with its subsidies and she is not convinced it will boost American jobs and manufacturing. "The goal of using EXIM as a weapon against China was a bad idea in the first place," she adds, concluding, "Economic fights and national security fights are not won with subsidies."

Hazelton disagrees. "EXIM provides a mechanism that American companies can use to vie for projects that would otherwise be out of reach," and "the banking industry won't finance because of risks associated with the host country," she says, arguing for the Bank's merit. "The truth is that EXIM provides financing only when the private sector will not or cannot (a concept known as additionality)."

Regarding China, the EXIM is, or could be, a weapon for the US. "Export credit is a strategic weapon in China's whole-of-government approach to enhance its global power, economic might, and national security," she states. If the EXIM is eliminated, she worries, this "leaves an unchecked China with a wide-open field to claim jurisdiction over swaths of ocean and shipping lanes, expand its economic influence, and create major changes in the global balance of power." America would be foolish, she states, to "relinquish EXIM as a powerful tool in America's asymmetrical warfare toolbox."

STC 2025 Commentary: Conservatives have long criticized the Export-Import Bank, which enjoyed decades of bipartisan support and strong backing from the US business community. Critics view it as an example of "crony capitalism," dubbed it "the Bank of Boeing," for its long support of the airline company. When Congress failed to renew its charter in 2015, the debate intensified -- a victory for the Tea Party, among loud EXIM critics. Its members oppose any role for the federal government and EXIM represents a private-public partnership, while they back unfettered capitalism and free markets.

Those who see value in the Bank, like Hazelton, argue that American manufacturers need financial help to compete in critical markets like trains, aircraft, nuclear reactors, and earth-moving equipment against foreign companies in China and elsewhere who get generous export credit backing from foreign agencies. Losing the bank risks ceding important economic power to China -- something the US must avoid.

Chapter 23 - Key Points:

Anti-Bank position:

- ✓ Eliminate the Bank: it's a protectionist agency that stymies economic growth
- ✓ Conservatives want to lower the federal government's role in economic markets

Pro-Bank position:

- ✓ The Bank helps US industries compete in critical markets against foreign companies who are backed by export subsidies -- leveling the playing field and protecting US interests
- ✓ Failure to support the Bank gives China a "wide open field" to control ocean and shipping lanes, expand its economic influence and global power



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Chapter 24. Federal Reserve. Author Paul Winfree. *Winfree is a Distinguished Fellow in Economic Policy and Public Leadership at the Heritage Foundation. Before 2018, he was Deputy Assistant to the President, Deputy Director of the Economic Policy Council, and Director of Budget Policy at the White House. He led the Trump presidential transition team responsible for the Office of Management and Budget in 2016.*

Winfree presents a critique of the Federal Reserve that focuses on its expansive powers to influence the economy and its lack of independence from the political process. In Winfree's view, reforms are needed to curb its mandate which permits interventions beyond protection of the value of the dollar and taking steps to curb inflation. Of particular concern is the ability of the Federal Reserve to "print money" to finance its operations, to intervene in mortgage-backed securities and private and public debt markets and its ability to take steps targeted to achieve full employment or other "environmental, social or governance" goals. The Federal Reserve is overly influenced by political pressures, resulting in actions that increase government debt.

Proposed reforms:

- ✓ Limit the mandate of the Federal Reserve to protecting the dollar and restraining inflation
- ✓ Avoid any influence on the Federal Reserve to advance environmental, social or governance goals
- ✓ Limit the Federal Reserve's lender-of-last-resort function
- ✓ Limit the Federal Reserve's intervention/support of assets such as mortgage-backed securities, long-term government debt and corporate or municipal debt
- ✓ Stop paying interest on excess reserves
- ✓ Reform the core activity of manipulating interest rates and money by implementing any, or all, of these changes:
 - "Free banking" -- eliminate the Federal Reserve
 - "Commodity-Backed Money" (restoring the gold standard)
 - Inflation and Growth Targeting
- ✓ Congressional reforms should include:
 - Eliminate "full employment" from the Federal Reserve mandate
 - Eliminate "flexible average inflation targeting"
 - Focus regulatory activities on maintaining bank capital adequacy rather than financial stability
 - Curb last-resort lending practices that support "too big to fail" subsidization and rescue
 - Appoint a commission to explore the mission of the Federal Reserve and alternatives to this system
 - Prevent the institution of a Central Bank Digital Currency



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STC 2025 Commentary: In Chapter 24, Winfree argues for limiting the powers of the Federal Reserve to influence the economy or eliminating it altogether. In his view, the Federal Reserve is an outdated institution created in response to a crisis caused by irresponsible banking in 1913 and has outlived its usefulness. In its current form, it is overly subject to political pressure to “print money” to finance government spending. Its mandates include undesirable goals such as full employment, overall financial stability and other “environmental, social or governance” objectives. These mandates have produced government bailouts of banks and corporate entities considered “too big to fail” that increase government debt. Reforms proposed include doing away with the Federal Reserve and returning to the gold standard as a way to monitor and control government spending.

Chapter 24 - Key Points:

- ✓ Federal Reserve is outdated and needs significant reform or elimination
- ✓ Overly influenced by political pressures
- ✓ Hazardous “printing of money” fuels government spending and debt
- ✓ Return to the gold standard as a way to control government spending

Chapter 25. Small Business Administration. Author: Karen Kerrigan, *President and CEO of the Small Business & Entrepreneurship Council. Sits on several federal advisory boards representing entrepreneurs and small businesses.*

Kerrigan notes the importance of the SBA, which helps small businesses (and thus jobs) survive in difficult times. Successful efforts include funneling money for disaster relief; she says that conservatives would also agree with the Paycheck Protection Program (PPP), which has been credited with saving millions of jobs during the COVID-19 pandemic. But Kerrigan also points to SBA programs that have wasted taxpayer money: for example, fraudulent applications for other forms of COVID-19 relief.

The SBA’s budget and priorities have fluctuated with each administration, but its core functions are: helping to finance small businesses; offering training; ensuring that small businesses get a certain percentage of government contracts; and advocating for small businesses’ concerns in the regulatory process. Reforms should focus on accountability, management, transparency, and strengthening the Office of Advocacy, which helps protect small businesses from over-regulation.

Proposed reforms:

- ✓ Expand and empower the Office of Advocacy to serve as a model for a conservative administration
 - “[S]upercharge [it] to dismantle extreme regulatory policies and advance limited-government reforms that promote economic freedom and opportunity”



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Kerrigan notes that the most abused aspect of the SBA's current function is the lending program. She singles out the fraudulent COVID-19 lending program for clean-up, in particular the loans made to Planned Parenthood affiliates that Kerrigan asserts were ineligible and should return the money. Further, she notes, if an investigation finds that Planned Parenthood knowingly misrepresented its eligibility, the Department of Justice should pursue it.

Proposed reforms:

- ✓ In future, move the function of making disaster loans to another agency
- ✓ In contrast, review rules that made some religious entities ineligible for SBA loans; these rules are a violation of the First Amendment (take down SBA Form 1971), she states

Finally, Kerrigan discusses ways to promote business success. She points first to the SBA's ability to encourage innovation through the SBIR program, which has "demonstrated its ability to fund advanced technologies through to private-market viability and invests more in America's heartland than venture capital invests."

She then argues for more investment in domestic manufacturing companies, whose products help ensure supply chain availability and independence from foreign goods. To stay competitive with other countries, Kerrigan suggests that SBA should offer loans to medium-size businesses when there are no other places for them to find capital.

This restructuring of the SBA requires new personnel, and an SBA Administrator and leadership team who share and execute the president's mission and policies effectively.

STC 2025 Commentary: Kerrigan echoes familiar conservative arguments for limiting government and reducing regulations. She adds detailed recommendations for effectively reducing regulations by using an expanded Office of Advocacy. Her call to remove or relax regulations that govern SBA and other taxpayer-funded loans to religious institutions is another example of the conservatives' concerted effort to reduce separation between church and state.

Kerrigan also echoes conservative party claims of rampant fraud in the COVID-19 loan programs and calls for investigating Planned Parenthood based on loans to its affiliates. Kerrigan argues that this money should be returned, and proposes possible legal consequences.

Chapter 25 - Key Points:

- ✓ Supercharge the SBA Office of Advocacy to reduce regulations for small businesses
- ✓ Punish Planned Parenthood for COVID-19 business loans given to affiliates
- ✓ Allow religious organizations to receive certain SBA loans

Chapter 26. Trade. Authors: Peter Navarro and Kent Lassman. *Peter Navarro is one of only three former senior White House officials in Trump administration who served from the start of the campaign through Trump's term in office. He is a former West Wing top China*



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hawk and trade czar, and served as Director of the Office of Trade and Manufacturing Policy and Defense Production Act Policy Coordinator. Kent Lassman is President and CEO of the Competitive Enterprise Institute, and a writer on topics of telecommunications, privacy, environmental, antitrust, consumer protection regulation, trade policy and regulatory systems.

Chapter 26 is a double chapter, with two separate authors making different, diametrically opposed arguments. In Part 1, Navarro argues for *fair* trade; in Part 2, Lassman also argues for *free* trade. While they disagree on fundamental strategy, they agree on the practical and symbolic significance of trade: as Navarro puts it, “economic security is also national security.” In Lassman’s words, “trade policy is about more than goods and services: it is a statement of American identity.” In other words, trade is a crucial element of US global dominance.

1. The Case for Fair Trade

Navarro sees the current situation as dire: he focuses on the damage caused by trade deficits (especially with China), which have been created by regulations imposed by countries that are trying to usurp US trade dominance. The first step to solving this issue is to reverse the trend of offshoring critical manufacturing and defense production. He lists the two major challenges to this goal:

1. The World Trade Organization (WTO), and its Most Favored Nation rule: the resulting high tariffs on American goods have caused the exploitation of American farmers and workers, and have produced trade deficits. “This systemic trade imbalance serves as a brake and bridle on both GDP growth and real wages in the American economy while encumbering the US with significant foreign debt.”
2. China: China has aggressively used protectionist tariffs in order to move toward global trade dominance; these have skewed international trade.

Navarro continues to outline the current trade deficits in the US and their causes (with detailed statistical information laid out in a series of tables), and concludes that if the US continues to increase its enormous trade deficit with China (a result of China’s economic aggression), there will be serious consequences for national security. China’s broader goal, he argues, is “to strengthen Communist China’s defense industrial base and associated warfighting capabilities.”

In other words, China wants to overtake the US as a global power, and thus poses an existential threat: “The CCP’s self-proclaimed goal is to supplant the US as the world’s dominant economic and military superpower.”

Proposed steps to solve the problem:

- ✓ Increase tariffs on goods made in China
- ✓ Give incentives to US companies that want to bring manufacturing back to US
- ✓ Prohibit Chinese companies from bidding on US government contracts
- ✓ Prohibit Chinese drones from American airspace
- ✓ Prohibit US pension funds from investing in Chinese stocks, and further regulate any American investment in Chinese companies
- ✓ Reduce and eliminate any US dependence on Chinese supply chains



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- ✓ Stop the flow of technologies to China through espionage
- ✓ End hiring of Chinese nationals to do STEM work in American universities and labs as deeply problematic; they take useful information back to China
- ✓ Order Homeland Security to identify and disrupt CCP influencers' social media operations

For these steps to be implemented, Navarro stresses, the next GOP president would need crucial personnel to speak with one voice and share his vision (which has not been the case in the past). He concludes that, if the US doesn't counter Chinese economic aggression, the consequences could be catastrophic: "In this scenario, might America thereby lose a broader war for America's freedom and prosperity, not by shots fired but by American cash registers ringing up 'Made in China' products? ...It follows that for both economic and national security reasons, trade deficits do indeed matter."

2. The Case for Free Trade

Lassman takes a very different, less pessimistic, view of the state of trade in the US. In his argument for free trade (versus Navarro's argument for more regulation), Lassman states that, "The US Constitution created what was then the world's largest free trade area, and it did so on purpose." US manufacturing and the US economy are *not* in decline, he argues; in fact "American manufacturing output is currently at an all-time high." Productivity is soaring; doing more with less is "America's superpower."

The key to successful trade policies is removing tariffs rather than imposing them, he states. Retaliatory tariffs (such as the 2018 steel tariffs) tend to backfire by causing job loss and higher consumer prices. "Trade is generally a win-win for both participants. Tariffs are a lose-lose-lose game," he states, while protectionism does not work.

The natural employment disruptions caused by changes in trade could be ameliorated by relaxing zoning rules and other types of regulations. Protectionism also weakens the supply chain, as was seen in the 2022 baby formula shortage, which was caused by an outdated tariff that kept foreign imports out of the market. The lesson learned is that "trade protectionism makes us more vulnerable, but free trade makes our families and communities more resilient."

Other proposals:

- ✓ Repeal the Jones Act ("unnecessary regulation") that requires ships traveling between US ports to be US-built, and American owned and crewed
 - This practice makes US vessels uncompetitive, argues Lassman
- ✓ Simplifying bilateral trade agreement negotiations to boost American competitiveness
 - To do this, Congress could grant the president more power to negotiate, through the Trade Promotion Authority
 - Keeping trade agreements free of trade-unrelated provisions would also help
 - Reforming or replacing the WTO, closing the Import-Export Bank are also steps



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Lassman agrees with Navarro on one important point: the threat posed by China. However, his solution is to promote trade with China rather than restrict it. Free trade creates peace, he suggests, and strong trade ties keep China more stable and predictable. The US needs a multi-pronged strategy to deal with China's aggression, and trade isolationism should not be part of it. He is optimistic that generational and culture shifts will eventually reduce China's threat.

Specific proposals:

- ✓ US rejoin the Trans-Pacific Partnership
- ✓ Use the Indo-Pacific Economic Framework for Prosperity as a diplomatic tool
- ✓ Encourage cultural connections to draw China's younger generation to western ideas

STC 2025 Commentary: Chapter 26 offers two opposing visions for reforming trade policies, which have a major effect on the US economy: Navarro argues for new regulation to redress what he sees as unfair WTO policies that hamper US trade and benefit China, while Lassman argues for a drastic reduction in regulation -- a reliance on the traditional Republican belief in the free market. Both see China as a major threat -- both economically and in terms of global power -- but while Navarro urges aggressive action, Lassman argues that free trade will produce peace.

Chapter 26 - Key Points:

- ✓ Transfer power for making trade agreements from Congress to the president
- ✓ Ensure that personnel are dedicated to carrying out the president's vision
- ✓ Recognize the threat of China -- current trade deficits and potential military actions
- ✓ Encourage cultural connections to draw Chinese youth to western ideas

SECTION 5. INDEPENDENT REGULATORY AGENCIES

Chapter 27: Financial Regulatory Agencies.

Securities and Exchange Commission and related agencies.

Author: David R. Burton *Burton is Senior Fellow in Economic Policy in the Thomas A. Roe Institute for Economic Policy Studies at The Heritage Foundation. He is a former General Counsel at the National Small Business Association and manager of the US Chamber of Commerce's Tax Policy Center. He focuses on securities regulation, tax policy, business law, entrepreneurship, and other financial issues, including climate-related financial risk.*

Consumer Financial Protection Bureau.

Author: Robert Bowes. *Bowes is a former banker who worked at HUD in 2017; he was appointed to the US Commodity Futures Trading Commission in 2020.*



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This is a two-part chapter: part 1 on the SEC and the CFTC, and part 2 on the CFPB.

The purpose of the SEC, Burton explains, is to administer the laws and regulations governing capital markets and capital market regulators, and to “deter and punish fraud and other material misstatements to investors; foster reasonable, scaled disclosure of information that is material to investors’ financial outcomes and proxy voting decisions; and maintain fair, orderly, and efficient secondary capital markets.” However, he argues, the current regulations are incoherent, and stray from the commission’s focus: “For example, the current SEC has proposed a climate change reporting rule that would *quadruple* the costs of being a public company.”

Such regulations would eventually affect the number of public companies and thus restrict investment opportunities for Americans, he feels. The SEC is mismanaged, even though the Chair has the power to make reforms. Given the current situation, the SEC should undergo drastic reforms: “The Securities and Exchange Commission (SEC) should be reducing impediments to capital formation, not radically increasing them,” he states.

Reforms to improve transparency and reduce ‘unnecessary’ regulations:

1. Establish a simpler securities disclosure system:
 - a. three basic categories of firm: private firms, an intermediate category of smaller firms, and public firms;
 - b. reasonable, scaled disclosure requirements; and
 - c. specified secondary markets for the securities of these firms.
2. Abolish the Public Company Accounting Oversight Board (PCAOB) and Financial Industry Regulatory Authority (FINRA); merge their functions with the SEC.
3. Prohibit any DEI strategies. Writes Burton: “Discrimination based on immutable characteristics has no place in financial regulation. Offices at financial regulators that promote racist policies (usually in the name of “diversity, equity, and inclusion”) should be abolished, and regulations that require appointments on the basis of race, ethnicity, sex, or sexual orientation should be eliminated. Equal protection of the law, equal opportunity, and individual merit should govern regulatory decisions.”

Because the SEC’s ultimate goal is to promote entrepreneurial capital formation, the commission should reduce the regulatory burden on issuers, particularly smaller entrepreneurs. Burton offers a series of specific, detailed changes to current regulations and suggests abolishing others to promote entrepreneurship.

The SEC should also reform capital markets:

Proposals:

- ✓ “Prohibit the SEC from requiring issuer disclosure of social, ideological, political, or ‘human capital’ information that is not material to investors’ financial, economic, or pecuniary risks or returns.”
 - “The proposed SEC climate change rule, which would quadruple the costs of being a public company, is particularly problematic.”



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- “Repeal the Dodd–Frank mandated disclosures relating to conflict minerals, mine safety, resource extraction, and CEO pay ratios.”
- “Oppose efforts to redefine the purpose of business in the name of social justice; corporate social responsibility (CSR); stakeholder theory; environmental, social, and governance (ESG) criteria; socially responsible investing (SRI); sustainability; diversity; business ethics; or common-good capitalism.”
- “Prohibit securities regulators, including SROs, from promulgating rules or taking other actions that discriminate, either favorably or unfavorably, on the basis of the race, color, religion, sex, or national origin of such individual or group.”

Burton then lays out a series of administrative reforms that would streamline the SEC’s data-gathering, enforcement, and operations, including merging certain offices to reduce redundancy and cutting managerial staff. Congress should then require better reporting about the SEC’s spending, especially on IT.

CFTC administration and improved commodities and derivatives markets:

In terms of commodities, Burton states, some reforms require congressional action.

Congress should:

- ✓ Clarify the definition of “commodity” and include digital assets
- ✓ Amend the Commodity Exchange Act for clarity
- ✓ Make it easier for the CFTC’s chair to remove the Executive Director; and make the CFTC more independent

Other reforms are internal to the CFTC:

- ✓ Change the position limits rule, to make the market less volatile
- ✓ Reduce over-prescriptive regulation; and clarify “Cross-Border” rules

Both the SEC and the CFTC have been remiss in developing rules to cover digital assets, he states. They should promulgate a joint regulation defining investment of digital assets and they should define the difference between digital assets that are securities and those that are commodities. Finally, Congress and the SEC should enact more oversight of Self-Regulatory Organizations (SROs) such as the Financial Industry Regulatory Authority (FINRA). If FINRA is not abolished and merged into the SEC, then at least its functions (such as enforcement and the imposition of fines) should be made transparent, with full reporting.

Consumer Financial Protection Bureau (Bowes)

Bowes advocates abolishing or severely curtailing the activities of the Consumer Financial Protection Bureau (CFPB). The CFPB was authorized in 2010 by the Dodd-Frank Act as an independent agency without congressional oversight. Its creation arose from regulatory failures that led to the 2008 financial crisis. The CFPB absorbed consumer protection responsibilities previously handled by the Office of the Comptroller of the Currency, Office of Thrift Supervision, FDIC, Federal Reserve, National Credit Union Administration, and FTC.



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Today, Bowes charges, the CFPB has “been assailed by critics as a shakedown mechanism to provide unaccountable funding to leftist nonprofits politically aligned with those who spearheaded its creation.” The CFPB, he states, is a “highly politicized, damaging, and utterly unaccountable federal agency,” and is also unconstitutional. He cites a claim made in 2015 by *Investor’s Business Daily* that accused the CFPB of “diverting potentially millions of dollars in settlement payments for alleged victims of lending bias to a slush fund for poverty groups tied to the Democratic Party”. He also accuses the agency of planning anti-discrimination lawsuits and investigations to “bankroll some 60 liberal non-profits, many of whom are radical Acorn-style pressure groups.”

His suggestion? The next president should order immediate dissolution of the CFPB and reverse Dodd–Frank Section 1061. The CFPB’s insulation from Congressional funding renders it independent of, and unaccountable to, Congress and the people, an issue that is currently before the Supreme Court.

Until the CFPB can be abolished, Bowes argues that Congress should:

- ✓ Ensure that civil penalties go into the Treasury;
- ✓ Repeal Dodd–Frank Section 1071 (which over-regulates small businesses, he feels)
- ✓ Require CFPB enforcement actions comply with the Administrative Procedure Act
- ✓ Allow respondents in such actions to elect where adjudication takes place; and specify the nature of “deceptive, unfair, and abusive” practices more precisely.

STC 2025 Commentary: Chapter 27 focuses on reforms of financial regulatory agencies that reflect familiar conservative approaches: some proposed reforms focus on dismantling any regulations that impede what the authors call entrepreneurial capital formation. Put simply, if businesses feel that regulations (on issues such as climate change or social responsibility) are holding them or their profits back, those regulations should be repealed. The authors focus in a striking way on DEI issues: they go out of their way to attack any regulations that gather data on, or attempt to rectify, discrimination.

The entire Mandate for Leadership document takes the extraordinary position that to recognize race as a category is *in itself racist*; thus any DEI attempts to promote better understanding of how racial inequality functions in the present day are racist.

The same ahistorical argument is applied to other categories – sex, sexual orientation, ethnicity, etc. The simplistic claim that hiring, for example, should be based on merit alone ignores a wealth of scientific studies that show how “merit” is not a neutral category, but is defined by those already in positions of power. It’s no surprise that the section on the Consumer Financial Protection Agency calls for its abolition; the agency’s role is to protect consumers, rather than businesses, from the kinds of practices that brought on the 2008 financial crisis.

Chapter 27 - Key Points:

- Abolish the Consumer Financial Protection Agency
- Prohibit all DEI programs
- Loosen regulations on businesses and entrepreneurial activities



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- Prohibit the SEC from noting whether companies are socially responsible (e.g., on climate change)

Chapter 28. Federal Communications Commission. Author: **Brendan Carr**, senior Republican currently on FCC. Former FCC General Counsel; attorney at Wiley Rein LLP. Former clerk, Court of Appeals, Fourth Circuit. Has over 20 years private and public sector experience in communications and tech policy.

The FCC is an independent regulatory agency that has jurisdiction over interstate and international communications by radio, television, wire, satellite, and cable. Its mission, states Carr, is to “promote freedom of speech, unleash economic opportunity, ensure that every American has a fair shot at next-generation connectivity, and enable the private sector to create good-paying jobs through pro-growth reforms that support a diversity of viewpoints,” and ensure secure and competitive communications networks, modernized infrastructure rules, and good stewardship of taxpayer dollars.

Carr lays out the structure of the FCC: five members, appointed by the president for fixed five-year terms, and no more than three Commissioners from the same political party (if there are five Commissioners). The Chairperson resigns when an incoming president of a different political party is sworn in, allowing the president to nominate someone. The Chairperson has more power than other Commissioners, and confirmation does not require Senate confirmation. There are no term limits on Commissioners.

Carr enumerates matters over which FCC has power, including: enforcing the Communications Act; addressing “net neutrality” rules and regulatory framework of broadband offerings; approving mergers that involve transfers of FCC licenses. Notably, the FCC recently facilitated transition from 3G to 4G and now 5G. It allocates consumer fees (Universal Service Fund) for broadband connections for rural areas, low-income, libraries, and schools.

He calls for FCC to “change course.” The primary goal is to “rein in Big Tech,” ensuring that a few dominant corporations do not continue to “drive diverse political viewpoints from the digital town square.” FCC’s section 230 provides websites, including social media companies, that host or moderate content generated by others with immunity from liability. This immunity should be limited, Carr states, in line with petitions filed by the Trump administration, and reforms that “prohibit discrimination against core political viewpoints” should be enacted.

Suggested reforms:

- ✓ The FCC should force Big Tech to be more transparent, mandating them to disclose practices that could shape Internet traffic in different ways
- ✓ Congress should compel Big Tech to pay its fair share of \$9 billion Universal Service Fund
- ✓ Congress should end speech protections that enable platforms to host “illegal content” such as child pornography, terrorist speech, or “indecent, profane, or similar categories of speech”



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- ✓ Consumers should be empowered “to control their own online experiences” through content moderation such as content filters and fact checkers. There should also be stronger protections against children accessing social media sites
- ✓ The FCC should also do more to protect national security from threats posed by China, including TikTok. Communications companies with over 10% ownership by foreign adversary governments should be removed. Communications partners should be compensated for expense of ending partnerships
 - ✓ Thwart Chinese government authoritarian control through artificial intelligence by stopping US business cloud computing access to Chinese companies
 - ✓ Advance a pro-growth agenda by freeing more airwaves for wireless connectivity and streamlining permitting processes
 - ✓ Aggressively open development of commercial wireless services
 - ✓ Promote accelerated construction of new cell sites, including opening up federal lands administered by BLM and US Forest Service
 - ✓ Eliminate many of the “heavy-handed FCC regulations,” including many of the FCC’s media ownership rules that restrict investment and competition
 - ✓ Focus FCC efforts on creating a market-friendly regulatory environment that fosters innovation and competition from a wide range of actors (cable, broadband, satellite internet)

STC 2025 Commentary: Carr calls on the FCC to simultaneously rein in Big Tech and create a market-friendly environment that makes commercial exploitation of airwaves easier. He calls for greater government oversight over social media, implying that Big Tech has a liberal bias. He mirrors Project 2025’s pro-life, antigay, anti-diversity agenda in arguing for an end to speech protections for “illegal content” including “indecent, profane, or similar categories of speech” (thinly veiled references to transgender, LGBTQ, and gender topics), and potentially outlawing discussions of a wide range of topics. His call to enhance consumer -- i.e., parental -- choice through content filters is in line with Project 2025’s antigay agenda, too. So is the proposal for more robust regulation of Chinese telecom companies, including TikTok, and his view of China as a primary foreign enemy and TikTok as a national security threat.

Chapter 28 - Key Points

- ✓ Rein in Big Tech to prohibit presumed liberal bias
- ✓ End free speech protections of “illegal content” – notably “indecent, profane, or similar categories of speech” that for conservatives would include gender, LGBTQ topics
- ✓ More aggressive stance enabling commercial exploitation of airwaves
- ✓ Protect against national security threats from China and TikTok as a platform, and other foreign adversaries



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Chapter 29. Federal Election Commission. Author: Hans A. von Spakovsky. *Von Spakovsky is an American attorney and a former member of the Federal Election Commission. He is the manager of The Heritage Foundation's Election Law Reform Initiative and a senior legal fellow in The Heritage Foundation's Meese Center for Legal and Judicial Studies.*

Von Spakovsky focuses on limiting the role of the Federal Election Commission (FEC) in enforcing the Federal Election Campaign Act (FECA) passed by Congress in 1971 and amended in 1974. FECA establishes the law governing campaign financing, and the FEC has exclusive enforcement authority over FECA violations. The FEC, by law, is a bipartisan body that may not have more than three of six commissioners representing one political party.

According to the author, the FEC's "regulation of campaign finance deeply implicates First Amendment principles of free speech and association." He notes that, because the FEC is an independent agency outside of the executive branch, the president's power to control the FEC is limited. But there are numerous actions that the president can take in relation to the FEC.

Proposals:

- ✓ Assure loyalist appointees to the FEC share the view of the current Republican commissioners that the FEC should not: overregulate political activity, act beyond statutory authority, construe ambiguous and confusing provisions against candidates and the public instead of the government, or infringe on protected First Amendment activity." This is aimed at protecting against "overzealous" prosecutors
- ✓ Since "the president does have control over the Department of Justice," the president should ensure that the DOJ prosecutes only "clear violations" of FECA and does not prosecute any provisions that may be ambiguous, unclear, or confusing
 - The DOJ also should only prosecute interpretations of the law with which the FEC agrees, and be bound by prior FEC opinions and findings
 - "The DOJ should not engage in criminal prosecutions that stretch legal theories and defy FEC interpretations and regulations"

The FEC is one of a few federal agencies that has its own litigation authority, independent from DOJ, and customarily defends itself against legal action through the federal court of appeals and is defended in the US Supreme Court by the Solicitor General. But past partisan disagreement among the six commissioners has failed to provide a needed fourth vote for litigation defense, so the FEC has failed to defend itself against numerous lawsuits, "filed by political allies of certain Democrat commissioners," charges Von Spakovsky, leading to the FEC defaulting in litigation in the federal courts.

Proposals:

- ✓ The president recommends Congress remove the FEC's independent litigation authority



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- ✓ The president directs the Attorney General to defend the FEC in all litigation where commissioners fail to authorize a defense

Other proposals:

- ✓ End the current practice of allowing FECA commissioners to stay beyond their terms in the absence of the appointment of a new commissioner
- ✓ Oppose any effort to change the number of commissioners from six to an odd number
- ✓ Loosen restrictions on the “ability of party committees to coordinate with their candidates”; raise monetary limitations on contributions; limit reporting requirements

STC 2025 Commentary: The author aims to reduce the power of the FEC, an agency independent of the executive branch, established by Congress to regulate campaign finance and spending laws under the Federal Election Campaign Act. According to experts at the progressive Brennan Center for Justice, the FEC is a barely functioning agency as it is; the bipartisan structure of the FEC has, in contemporary politics, resulted in gridlock, stagnation, and failure to enforce limits on “dark money” contributions, and failure to ensure transparency in campaign advertising. The FEC has proven unable to update regulations in response to a landscape of social media and now artificial intelligence that did not exist when the law was passed or last amended.

This section reflects conservative strategies for giving the president greater control over a now-independent agency, backed by loyalist commissioners who agree with the ideological goal of a weakened FEC. It would use the DOJ as a tool to limit enforcement of FEC regulations, but also as a defensive weapon against public attempts to enforce the laws.

The author’s proposals to amend the Federal Election Campaign Act would reduce the FEC’s independence and undermine its authority. Similarly, proposals to amend the limitations on campaign contributions and lower transparency and reporting requirements would make it easier for dark money and major donors and Political Action Committees to influence elections.

Chapter 29 - Key Points:

- ✓ Ensure FEC appointees are loyalists prepared to execute the president’s agenda
- ✓ Limit DOJ enforcement action of FECA violations
- ✓ Authorize the DOJ to defend public lawsuits against the FEC
- ✓ Propose Congressional action to reduce FEC independence, weaken campaign finance and reporting laws

Chapter 30. Federal Trade Commission. Author: Adam Candeub is a professor of law at Michigan State University whose research focuses on telecommunication, antitrust, and Internet issues. He was an acting Assistant Secretary of Commerce and Deputy Associate Attorney General at the Justice Department for the Trump Administration.



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The Federal Trade Commission was created to counter anticompetitive, unfair, and deceptive practices in the marketplace, such as price fixing, empowering the FTC to enforce provisions of the 1890 Sherman Act and 1914 Clayton Act that were enacted to help regulate business. In this chapter, Candeub reviews the conservative debate over the impact of antitrust laws. He is critical of “social responsibility” practices such as Environmental, Social, and Governance (ESG) requirements on publicly traded corporations and their inclusion in business agreements that, he states, undermine free markets and profits, a view shared by economist Milton Friedman.

Candeub opposes the role of government “in maintaining market concentration in areas ranging from pharmaceuticals and healthcare to avionics, banking, and real estate brokerage.” He warns against collusion “between the Big Tech internet platforms and the Biden White House and administrative agencies—to censor criticism, scientific fact, and uncomfortable political truths.” While conservatives remain divided over issues like antitrust laws, they need to realign the FTC with free market principles, he states. “Unless conservatives take a firm hand to the bureaucracy and marshal its power to defend a freedom-promoting agenda, nothing will stop the bureaucracy’s anti-free market, leftist march.”

Proposed reforms:

- ✓ The FTC should carefully recalibrate certain aspects of antitrust and consumer protection law and enforcement
- ✓ The FTC should set up an ESG/DEI ‘collusion’ task force to investigate firms—particularly in private equity -- to see if ESG practices are used as a means to meet targets, fix prices, or reduce output
- ✓ Congress should investigate ESG practices as a cover for anticompetitive or unfair trade practices
- ✓ The FTC has the authority, interest, and duty to protect children from exposure to social media
 - The FTC should examine platforms’ advertising and contract-making with children as a deceptive or unfair trade practice, perhaps requiring written parental consent
- ✓ The FTC should consider a liaison to state attorneys general (AGs) to discuss enforcement policy in key sectors under the FTC’s jurisdiction: Big Tech, hospital mergers, supermarket mergers, etc.
- ✓ The FTC must become more sophisticated in measuring consumer surplus and how platforms, including Big Tech, create and keep market power

STC 2025 Commentary: While the FTC’s mission is focused on financial oversight – focusing on antitrust and anticompetition of deceptive trade practices -- the real focus on Project’s 2025’s proposed reforms of the trade agency are designed to tackle their ideological cultural targets: DEI, and ESG practice – which they view as “covers” for unfair trade practices. In fact, the reforms are designed to weaponize the FTC to advance the conservative Christian agenda of “protecting innocent children” from exposure to what Candeub calls “the Leftist march,” and borrow the language and agenda of the anti-choice movement in the focus on



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parental control. The call to use Attorneys General to focus on monopolies reflects the conservative movement’s concern about the significant power that “liberal” Big Tech platforms wield due to their popularity, and their private influence on communication policy which is outside government control. If enacted, the proposed FTC reforms would restrict public access to ideas, expression and content that falls outside the conservative Christian ideology, eliminating LGBTQ+ and pro-choice content, and topics related to sexuality, as discussed in earlier chapters.

Chapter 30 - Key Points:

- ✓ Reform FTC policies and consumer protection laws, with a focus on eliminating ESG and DEI policies in companies -- particularly in private equity
- ✓ Give FTC the “authority, interest, and duty” to censor the Internet and Big Tech platforms under the guise of protecting children from exposure to “Leftist” and “liberal” content on social media
- ✓ Promote the idea of tech company “contracts” with children, possibly with parental consent, to limit what children can access on the Internet – a social control goal
- ✓ Using Attorneys General to push anti-monopoly enforcement measures to break up Big Tech, hospital, and supermarket mergers

Onward! **Author: Edwin J. Feulner.** *Founder, Board Member, former Board of Trustees Chairman, ex-President (1977-2013, 2017-2018) of The Heritage Foundation. Former Executive Director of the Republican Study Committee. Author of nine books, editor; columnist; Chairman, Townhall.com.*

In an enthusiastic afterword, Heritage Foundation founder and conservative elder statesman Feulner focuses the reader on a key lesson that the conservative movement learned over the years, and during the Trump Administration: *focus on personnel*. “People are policy,” states Feulner, noting, “personnel choices will ultimately determine the success or failure of the policy agenda, and hence, of the whole Administration.”

That view informs Project 2025’s intensive, organized focus on early recruitment, vetting resumes, training, establishing an administrative curriculum, and preparing teams of experienced department advisors to shepherd conservative and loyalist nominees into key positions of government – the conservative Christian rule-writing army – while clearing out career professionals.

Feulner is clearly proud of his – The Heritage Foundation’s – role in the Trump Administration, taking credit for the administration’s adoption of 64 percent of its organization’s policy recommendations. As a result, he states, “the Trump Administration cut taxes and eliminated unnecessary regulations, creating a growing economy and the lowest unemployment rate in five decades -- including among minorities and women -- solutions based on the core principles of free enterprise, limited government, individual freedom, traditional American values, and a strong national defense.”



Stop the Coup 2025

a public education and mobilization campaign

STC 2025 Commentary: In his closing, look-ahead remarks, Feulner seeks to remind readers – and America, and possibly Trump himself – of his, and The Heritage Foundation’s, longtime role in visioning the nation’s future, and helping to implement deeply conservative public policies. He clearly hopes a future Trump or other GOP president will enact many of the far more radical steps proposed in the new blueprint.

What’s left unsaid by Feulner – rather remarkably – is any mention of the extremist shift The Heritage Foundation and other conservative groups have made since the Reagan years, to now back the call for autocracy – a “supreme” leader. It’s a far cry from the Republican Party vision documents of the 1980s or even 1990s. Feulner is silent about the harms of unbridled authoritarianism, the evisceration of checks and balances, and the incredible negative backlash Project 2025 would direct against groups of Americans, as well as immigrants – the very population that forms the backbone of the United States. America remains a nation of immigrants.

Project 2025 could rightly be deemed an unpatriotic, un-American vision, because it advances a system of governance more like the dictatorships that conservatives claim to oppose. Here, Christian conservatives repeatedly cite Viktor Orban’s autocratic regime in Hungary as a useful model for their newly muscular cultural war on gender and diversity, and their attacks on Big Tech and companies that they fear are influencing America’s youth to embrace progressive values and principles such as equality, human rights, and democracy.

There is also no acknowledgement of the deeply racist and white supremacist views that permeate Project 2025. As noted earlier, the entire vision document takes the extraordinary position that to recognize race as a category is *in itself racist*. It applies similar ahistorical arguments to other categories of inequity – gender, sex, sexual orientation, ethnicity, physical ableness, etc. This viewpoint is a form of sociopolitical gaslighting – turning the naming of the harm (the accusation) back on those who suffer from it. What Project 2025 proposes, shining through 887 pages of conservative viewpoints, is a profoundly racist, sexist, homophobic, ableist, white supremacist, evangelical Christian vision of America – all the isms. Its reforms seek to deny or render invisible the diverse melting pot of our nation.

There are ironies, too. Project 2025’s goal of imposing conservative Christianity as the basis of law and policy for America has more in common with governments led by orthodox religious leaders – for example, hardline Islamic regimes -- that conservatives deem historic enemies of Christianity and criticize as repressive. Yet, they would impose Christian theocracy on America.

Looking ahead, then, Project 2025 represents what many US mainstream analysts and media have warned: a blueprint for dictatorship, one that would move America sharply away from its deepest principles and origin story as a nation of immigrants that welcomes all, a nation guided by democratic principles enshrined in our Constitution and Bill of Rights, including a collective embrace of equality for all, the right to a life free of tyranny and violence, with freedom of speech and a free press, and with freedom of religion – any religion. That includes, of course, not practicing any religion, either.

In a word, Project 2025 is at war with choice, and America is built on that very principle: the freedom to choose.



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STC 2025 Afterword

A WARNING AND A PLEA

***We close our Summary and analysis
with a warning and a plea.***

Our warning is that if even a portion of Project 2025's reforms are implemented, America and a great number of Americans will suffer, including many federal employees who will lose jobs overnight. Those targeted for discrimination, including LGBTQ+ people and immigrants, will face increased intolerance and far worse if the next president seeks to carry out the plan to strip them of their rights.

Project 2025 envisions a mega domestic law enforcement agency, beefed up by military troops, which calls for America to step back into ugly chapters of its past – the 1950s McCarthy era, the 20-year FBI illegal COINTELPRO spying on progressive Black and Brown civil rights leaders, feminists, antiwar activists and others. We learned the painful lessons of these chapters.

So, we're not exaggerating when we say the writing is on the wall here – the wall being Project 2025. There are countless examples of vitriol and animus and cruelty – a desire to punish and hurt – that animate the details of the vision extolled as Project 2025.

It's visible in the disparaging words used to describe transgender people, the plan to build mass camps to detain and deport undocumented immigrants, the forced return of children alone in the world to countries gripped by conflict. All of these proposals are marked by cruelty.

It's evident in the plan to, overnight, dismiss 50,000 hard-working, career government employees, and strip them of hard-earned pensions. It's clear in the plan to strip US funding for any groups -- domestic or foreign -- with the temerity to support a woman's right to choose, or gay rights, or attempts to address systemic racism and racial inequality, or policies to protect our planet – the very soil, and sky, and seas that support human life. Project 2025's proposals would imperil our future by reversing critical climate change policies. Doing so would have devastating effects on our world.

Project 2025 is, indeed, a punishing vision, a call to rule by force -- hurting, policing, silencing, and suppressing -- in order to govern without opposition. And that, history shows us, is the favored path of dictators and dictatorships.

Our plea Given that Project 2025 and its conservative supporters have opted to publicly share their draconian vision for America, we are publicly adding our voices to the growing number of Americans and global citizens who strongly oppose Project 2025 and its ideology of intolerance, nativism, and isolationism, its bleak fearful vision for America, its cruel future



Stop the Coup 2025
a public education and mobilization campaign

harms, its disregard for our planet – putting profit and unfettered corporate capitalism above all. That’s a recipe for disaster.

We urge all Americans to read the plan themselves, and then share it widely and quickly, with others in their communities, at work, at home, in their places of faith, and around the world.

We feel that Project 2025 speaks for itself, as a frightening prescription for America.

We urge everyone to get informed, and mobilize quickly to stop its agenda from advancing.

One way to do that is by voting against those who support its agenda, not only in the presidential election, but all the smaller state and local level elections where conservatives are busily seeking to implement its policies, including with test-case lawsuits.

Knowing what is planned allows us to fight back. There are many strategies, tools, field lessons, and approaches that can proactively mitigate the planned attacks outlined in Project 2025. We need to come forward, as a nation of millions of patriots, and apply them at all levels.

Project 2025 is taking aim at all of us – the big we – including Americans and a global public, given the conservative party’s goal of reversing decades of US domestic and foreign policy that, if enacted, will threaten our security and current freedoms. Their plan for autocracy needs to be staunchly opposed, and exposed.

To do that, we need all Americans who believe in our Constitution and civil rights to engage with us. What America is and does impacts the world.

We need everyone to say yes, we agree: Project 2025 represents an unprecedented danger to America and the world. We have to fight hard now to defend our democracy.

We need every voice to say NO to Project 2025. We need every American to vote NO to a Christian-led autocracy.

At Stop the Coup 2025, our door is open.

Please join us.

And remember, now is the time to act.