



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Office of the Secretary

Assistant Secretary for Health
Washington, D.C. 20201

January 13, 2026

To: Tammy Born Huizenga
Senior Advisor, Office of the Assistant Secretary for Health
Department of Health and Human Services

From: ADM Brian Christine
Assistant Secretary for Health
Department of Health and Human Services

Subject: Limited Conflicts of Interest Waiver for Tammy Born Huizenga under Title 18,
Section 208(b)(1) of the United States Code

The purpose of this memorandum is to grant you a limited waiver of the conflicts of interest law, 18 U.S.C. § 208(a). The need for a waiver is discussed in detail below and is based on full disclosure of your financial interests and the nature and circumstances of matters in which you may be involved as Senior Advisor in the Office of the Assistant Secretary for Health (OASH) at the Department of Health and Human Services (HHS or the Department). Without a waiver, you will be prohibited from fully engaging in a significant portion of the work in support of the Department's Make America Healthy Again (MAHA) initiatives you have been brought to HHS to do.

Background

You joined HHS on August 10, 2025, and currently serve as Senior Advisor in OASH. In this position, you are expected to be involved in all MAHA initiatives related to promoting and improving whole person health. Such matters are expected to include matters related to nutritional guidelines, public health interventions, infectious disease and vaccine policies, research and programs incorporating alternative and integrative health modalities, research integrity and human protections regulations, informed consent policies, physical activity initiatives, environmental exposure policies, research and awareness of diagnostic tools and options, ingredients used in processed foods, improving access to coordinated care to simultaneously address all health and well-being needs, nutritional and consumer product labeling, wearable health technologies, applicable public-private partnerships, and media and communications campaigns promoting patient engagement and lifestyle choices.

Your spouse has a financial interest in Oak Investors Group, LLC, (Oak Investors) which is a fund of funds that contains a variety of underlying interests including, relevantly, interests in pharmaceutical preparation manufacturing, surgical and medical instrument manufacturing,

general line grocery merchant wholesalers, and insurance agencies and brokerages. The value of this interest exceeds \$5 million. Your spouse also holds a financial interest in Praxis Group Holdings, LLC (Praxis) estimated to be around \$13.5 million as well as an estimated \$10 million in Unette Seller HoldCo LLC. Praxis owns Unette Corporation (Unette), and Unette Seller HoldCo LLC has equity interest in Unette Corporation as well. Praxis focuses on over-the-counter and prescription drug packaging and Unette focuses on packaging for supplements as well as for cosmetics and other items regulated by the FDA. Additionally, you and your spouse hold financial interests in communications media companies and companies that develop and sell computer hardware, software and related internet technologies, and your spouse owns an interest in the Sovereign Capital Venture IV, LP, which invests in companies that operate in these areas. The aggregate estimated value of these latter interests exceeds \$500,000. Together, all of the described holdings represent substantially less than 10% of the assets you and your spouse hold, individually and jointly.

As an Executive Branch employee, you are subject to the conflicts of interest statute, 18 U.S.C. § 208(a). This statute prohibits an employee from participating personally and substantially in an official capacity in any particular matter in which the employee has a personal or imputed financial interest if the particular matter will have a direct and predictable effect on that interest. The financial interests of an employee's spouse are imputed to the employee. Accordingly, in addition to being prohibited from personally and substantially participating in any particular matter that will have a direct and predictable effect on your personal financial interests, you also are prohibited from personally and substantially participating in any particular matter that will have a direct and predictable effect on the financial interests of your spouse. Therefore, you have a disqualifying financial interest in any particular matters that will have a direct and predictable effect on the above-described financial interests.

Thus far, the holdings that are the subject of this waiver have not resulted in a conflict of interest. To date, your official duties have been limited to operational and/or front office responsibilities largely focused on internal processes, which include maintaining a broad overview of Departmental activities and engaging only on broad matters. You have consulted with the Ethics Division of the Office of the General Counsel to fully understand your recusal obligations. Based on this, I conclude that your duties to date have not directly and predictably affected the financial interests covered by this waiver.

A Waiver Is Needed

Those with the title of OASH Senior Advisor provide expert executive level advice, guidance, and support to the Assistant Secretary for Health, the Chief of Staff and other senior leadership in the OASH on key mission-critical issues, initiatives and agency functions. Additionally, they conduct numerous complex and high-priority special assignments at the direction of the Chief of Staff and other senior leadership in OASH involving extensive research, fact-finding and program improvements on a variety of high-level subjects of critical importance to the Agency; assure the Chief of Staff and other senior leadership in OASH is provided with pertinent information for decision-making on highly sensitive and potentially controversial issues; and make recommendations arising from the studies and analyses that are instrumental in the direction and development of major policy, program, and legislative initiatives. The OASH Senior Advisor advises on the implications of proposed, new, or revised policies, regulations, and legislative proposals and assesses their impact on agency mission and organizational structure; and coordinates

and consults with senior management officials of the Agency and Department, other agencies, and external stakeholders, as appropriate, regarding major initiatives, actions accomplished, milestones to be achieved, and any issue or problems of significance.

The duties and activities you were hired to do are specifically focused on the healthcare and consumer sectors, and much of your work will impact companies throughout the industry, including those involved in the sale of pharmaceutical, biotechnology, or medical devices, equipment, preparations, treatments, or products; healthcare management or delivery; cosmetics; and food and/or beverage production, processing, or distribution, all of which are areas in which the underlying investments of Oak Investors, and Praxis, and Unette have lines of business. Your HHS work is likely to also impact media companies and companies that develop software and related internet capabilities that can be used in products intended to improve health or facilitate care, which are areas in which you and your spouse hold financial interests directly and through the Sovereign Capital Venture IV, LP. Absent a waiver, however, you cannot perform any substantive duties related to any of the areas in which the financial interests covered by this waiver work, including food and medication labeling, healthcare management and delivery, wearable devices, patient engagement, and lifestyle promotion.

Therefore, I have concluded that the interests discussed above are disqualifying financial interests. Pursuant to 18 U.S.C. § 208(b)(1), however, I have the authority to grant a waiver of the statutory prohibition of your involvement in particular matters that may affect those interests upon a determination that the disqualifying financial interest in a particular matter or matters is not so substantial as to be deemed likely to affect the integrity of your services to the Government.

Matters Covered

Subject to the limitations identified below, I am granting this limited waiver to allow you to participate in particular matters, including particular matters of general applicability¹ and particular matters involving specific parties² in which you would have an otherwise disqualifying financial interest because of one or more of the financial interests described above.

Factors for Consideration

The Disqualifying Financial Interest – The financial interests that disqualify you from fully undertaking the duties of Senior Advisor in OASH are the holdings described above in the underlying investments of Oak Investors, and in Praxis, Unette and the Sovereign Capital Venture IV, LP, that are held by your spouse, and interests you and your spouse individually and jointly own or might acquire in communications media companies and companies that develop and sell computer hardware, software and related internet technologies. These holdings are held in individually and jointly owned retirement and brokerage accounts.

¹ A “particular matter of general applicability” means a “particular matter that is focused on the interests of a discrete and identifiable class of persons but does not involve specific parties.” 5 C.F.R. § 2640.102(m).

² A particular matter that involves specific parties includes “any judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, arrest or other particular matter involving a specific party or parties.” 5 C.F.R. § 2640.102(l). A particular matter involving specific parties “typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties.” *Id.*

The Value of the Disqualifying Interest – The aggregate value of the financial interests covered by this waiver constitute a small fraction of your non-real estate investment assets. Although the aggregate value of the interests covered by this waiver exceeds \$25,000,000, it represents substantially less than 10% of the assets you and your spouse hold, individually and jointly. The disqualifying financial interest is therefore not so substantial as to be likely to affect the integrity of your services.

The Nature and Importance of Your Participation – You were selected to serve as a Senior Advisor on the Office of the Assistant Secretary for Health based on your expertise and experience in the whole-person, functional approach to healthcare, especially preventative healthcare and the treatment of the causes of disease, not just the symptoms. For more than 30 years you engaged in patient-centered evidence-based healthcare, integrating traditional Western medicine practices with integrative medicine, serving as the chief medical officer of the Born Preventive Health Care Clinic from 1998 until you joined OASH.

Your proven record of integrating nontraditional therapies with conventional medicine and willingness to challenge convention offers unique insights and the depth of understanding needed to address critical shortcomings in the American healthcare system. For these reasons, you were identified as the individual best-suited to undertake the duties you have been hired to undertake. Your involvement in the consideration of policies as well as practical tools and initiatives intended to improve both care and the patient experience will be of significance to the matters on which you will work.

No Insurmountable Appearance Concern – I have considered whether this case presents an insurmountable concern about the appearance of impropriety and have concluded it does not, especially given the circumstances outlined above. Where an employee complies with the terms of a section 208 waiver, the granting of a waiver will be deemed to constitute “a determination that the interest of the Government in the employee’s participation outweighs the concern that a reasonable person may question the integrity of agency programs and operations.” 5 C.F.R. § 2635.501(b)(3).

Limitations

To ensure your compliance with the conflicts of interest law, this waiver is limited in the following ways.

No Authorization To Participate in Matters Beyond HHS MAHA initiatives. This limited waiver does not permit you to personally and substantially participate in any particular matters in other HHS program areas. In the event you asked to participate in matters other than HHS MAHA programs and initiatives (described above), further consideration of your potential for conflict of interest will be required.

No Authorization To Participate in Any Other Particular Matters in Which You Have a Disqualifying Financial Interest. This limited waiver does not permit you to participate in any particular matters, including particular matters of general applicability and particular matters involving specific parties, that may affect any of your or your spouse’s financial interests other than those described in this waiver.

Limitations on Disqualifying Financial Interests. This limited waiver will no longer apply should the value of your disqualifying financial interests (described above) rise to more than 10% of your and your spouse's overall investment portfolio.

Particular matters that you may not participate in should be sent to your supervisor for reassignment without your knowledge or involvement. If you have any questions about whether you are permitted to participate in any particular matter under this waiver, including particular matters of general applicability, you are advised to consult with the Ethics Division of the Office of the General Counsel. This waiver is effective for the duration of your appointment and so long as your duties do not change; if your duties change at any time, you are advised to consult with the Ethics Division of the Office of the General Counsel as this waiver will need to be re-evaluated.

Conclusion

For the specific reasons detailed above, I grant you a limited waiver under 18 U.S.C. § 208(b)(1) to permit you to participate as Senior Advisor in the Office of the Assistant Secretary for Health in particular matters within the MAHA initiatives portfolio that might affect your personal and imputed financial interests described in this waiver.

The Office of Government Ethics has been consulted concerning the issuance of this waiver, as specified in 5 C.F.R. § 2640.303. A signed, final copy of this waiver will be forwarded to the Office of Government Ethics (OGE), as specified in 5 C.F.R. § 2640.303, and upon request, a copy will be made available to the public in accordance with the procedures described in 5 C.F.R. § 2640.304. That office also will list your name as a recipient of this waiver on its website in accordance with the procedures described in OGE/GOVT-1, System of Records Notice (2024).