

Congress of the United States
House of Representatives
Washington, D.C. 20515

February 21, 2025

The Honorable Pamela Bondi
Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Dear Attorney General Bondi:

We write regarding a series of recent actions by the Department of Justice (DOJ) that have significantly restricted the federal government's ability to deter, investigate, and prosecute corruption in the United States and abroad. Over the past weeks, the Trump DOJ has removed and reassigned highly respected leadership in DOJ's Public Integrity Section, halted DOJ enforcement of the Foreign Corrupt Practices Act (FCPA), and disbanded several DOJ anti-kleptocracy initiatives, which targeted and seized ill-gotten assets of corrupt foreign actors in several countries, including Russia and China. Just last week, eight veteran career prosecutors resigned in protest rather than follow illegal orders from DOJ leadership to dismiss corruption charges against New York City Mayor Eric Adams. Far from rooting out corruption and fraud in our government, as President Trump likes to claim, the Trump administration and DOJ's actions constitute an unprecedented assault on the laws, government agencies and people fighting corruption.

Favorable Treatment of Certain Public Officials in DOJ Matters

As the *New York Times* recently noted, "Mr. Trump's interest in fighting corruption is selective."¹ The Administration has declined to hold accountable several high-ranking current or former public officials under investigation for, charged with, or convicted of corruption. DOJ last week shockingly directed prosecutors to drop its corruption case against Mayor Eric Adams, who had been charged with bribery, fraud, and soliciting illegal foreign campaign donations.² DOJ's decision led the former Trump-appointed Acting U.S. Attorney for the Southern District of New York, the Acting Chief of DOJ's Public Integrity Section, the Acting Head of DOJ's Criminal Division, and several other DOJ career prosecutors to resign in protest—a development that legal experts have likened to the Watergate-era Saturday Night Massacre.³

¹ *Trump and Musk Hunt for Corruption, Very Selectively*, New York Times (Feb. 12, 2025) (online at www.nytimes.com/2025/02/12/us/politics/trump-musk-corruption.html).

² *Justice Department Directs Prosecutors to Drop Federal Corruption Case Against New York City Mayor Eric Adams*, CNN (Feb. 10, 2025) (www.cnn.com/2025/02/10/politics/eric-adams-charges-dropped/index.html).

³ *A Wave of Justice Dept. Resignations Evokes the Saturday Night Massacre of the Watergate Era*, New York Times (Feb. 14, 2025) (online at www.nytimes.com/2025/02/14/nyregion/nixon-saturday-night-massacre-adams-sassoon.html?smid=url-share); *Federal Prosecutors in New York and Washington Resign After Refusing to*

According to the former Acting U.S. Attorney, who prosecuted the Adams case, Mr. Adams's attorneys "repeatedly urged what amounted to a *quid pro quo*, indicating that Adams would be in a position to assist with the Department's enforcement priorities only if the indictment were dismissed."⁴ And indeed, the DOJ memorandum explaining its decision corroborates this account, admitting "particular[] concern" about the prosecution's effect on Mr. Adams's ability to support "the immigration objectives established by President Trump and the Attorney General[.]"⁵

Further reinforcing suspicions about the transactional nature of this decision, in an interview on *Fox News* on February 14, 2025, you reportedly praised Mr. Adams's recent moves on immigration enforcement and confirmed that his security clearance will be reinstated following the termination of the prosecution.⁶ And even more explicitly, President Trump's border czar Tom Homan stated on a *Fox & Friends* interview that same day: "If [Adams] doesn't come through, I'll be back in New York City, and we won't be sitting on the couch. I'll be in his office, up his butt, saying 'Where the hell is the agreement we came to?'"⁷

Another prosecutor on the case noted in his resignation letter that "[n]o system of ordered liberty can allow the Government to use the carrot of dismissing charges, or the stick of threatening to bring them again, to induce an elected official to support its policy objectives."⁸ As the *Wall Street Journal* reported, the decision, which allows DOJ to reinstate the charges at a later point, gives Mr. Adams "a powerful incentive to follow the president's policy wishes," represents "a departure from the way the Justice Department traditionally handles cases," and risks turning DOJ "into an operation where law enforcement is open to negotiation."⁹

Mr. Adams, moreover, is only one of several Trump-allied current or former officials whom the Trump Administration has shielded from criminal exposure. DOJ last month moved to withdraw felony charges against former Representative Jeffrey Fortenberry of Nebraska, who was convicted in 2022 of lying to the FBI during an investigation concerning illegal foreign

Drop Adams Charges, NBC News (Feb. 13, 2025) (online at www.nbcnews.com/politics/justice-department/top-federal-prosecutor-ny-resigns-told-drop-adams-charges-rcna192030).

⁴ *Order to Drop Adams Case Prompts Resignations In New York and Washington*, New York Times (Feb. 13, 2025) (online at www.nytimes.com/2025/02/13/nyregion/danielle-sassoon-quit-eric-adams.html).

⁵ Memorandum from Acting Deputy Attorney General Regarding Dismissal Without Prejudice of Prosecution of Mayor Eric Adams at 2 (Feb. 10, 2025) (online at www.nytimes.com/interactive/2025/02/10/nyregion/adams-case-dismiss-memo.html).

⁶ *Bondi Praises Adams on Immigration and Says Case Will Soon Be Dismissed*, New York Times (Feb. 14, 2025) (online at www.nytimes.com/live/2025/02/14/nyregion/eric-adams-charges-doj/e7c839c5-00e8-5ba6-9990-33577e18bdbd?smid=url-share).

⁷ *Trump Border Czar Crows That New York City Mayor Must Do His Bidding*, Politico (Feb. 14, 2025) (online at www.politico.com/news/2025/02/14/trump-border-czar-new-york-00204346).

⁸ Letter from Assistant United States Attorney Hagan Scotten to Acting U.S. Deputy Attorney General Emil Bove (online at www.nytimes.com/interactive/2025/02/14/nyregion/scotten-letter.html).

⁹ *Dismissal of Eric Adams Case Represents Departure for DOJ*, Wall Street Journal (Feb. 12, 2025) (online at www.wsj.com/us-news/law/adams-dismissal-adds-political-dynamic-to-prosecution-decisions-ea996d58).

campaign donations.¹⁰ Earlier this month, DOJ prosecutors filed a motion to withdraw from a campaign finance investigation against Representative Andy Ogles.¹¹ And President Trump last week issued a pardon for former Illinois Governor Rod Blagojevich, who was removed from office and convicted in 2011 on 17 criminal charges arising from a corrupt scheme to sell an appointment to a vacant Senate seat.¹²

Weakening Anti-Corruption Enforcement

As DOJ has accorded favorable treatment to certain public officials, it has also taken several actions that have institutionally weakened its ability to pursue both domestic and foreign corruption. In January 2025, the incoming Trump Administration abruptly removed and reassigned several highly experienced DOJ staffers, including the chief of DOJ's Public Integrity Section, a nonpartisan career official who had served in that role since the first Trump Administration. As one former senior DOJ official noted, these reassignments represent "the dismembering of a core cadre of nonpartisan, institutional experience that is invaluable to the Justice Department's mission[.]"¹³

On February 10, 2025, President Trump issued an Executive Order directing you to, among other things, cease initiating any new investigations or enforcement actions under the FCPA—for decades DOJ's principal tool against bribery by both U.S. and other entities of foreign officials, upheld by both Democratic and Republican administrations—for 180 days and "review in detail all existing FCPA investigations and enforcement actions[.]"¹⁴ While the Order asserts that suspension of FCPA investigative and enforcement activity is necessary to promote "strategic business advantages" for U.S. businesses abroad, DOJ's own longstanding guidance squarely contradicts this rationale, making explicit that "[c]orporate bribery is bad for business," in that it "raises the risks of doing business, putting a company's bottom line and reputation in

¹⁰ *Trump Justice Department Files to Drop Charges Against Former Nebraska U.S. Rep. Jeff Fortenberry*, Nebraska Examiner (Jan. 28, 2025) (online at <https://nebraskaexaminer.com/2025/01/29/trump-justice-department-files-to-drop-charges-against-former-nebraska-u-s-rep-jeff-fortenberry/>).

¹¹ *Federal Prosecutors Withdraw From Andy Ogles Investigation Where FBI Seized Phone*, The Tennessean (Feb. 3, 2025) (online at www.yahoo.com/news/federal-prosecutors-withdraw-andy-ogles-204231989.html).

¹² *Trump Pardons Former Illinois Gov. Rod Blagojevich*, CNN (Feb. 10, 2025) (online at www.justice.gov/criminal/criminal-fraud/file/1292051/dl?inline www.cnn.com/2025/02/10/politics/trump-pardons-rod-bлагоjevich/index.html).

¹³ *Justice Department Removes Senior Career Officials from Key Positions*, Washington Post (Jan. 21, 2025) (online at www.washingtonpost.com/national-security/2025/01/21/justice-trump-removes-senior-staffers-national-security-criminal/).

¹⁴ Executive Order, *Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security* (Feb. 10, 2025) (online at www.whitehouse.gov/presidential-actions/2025/02/pausing-foreign-corrupt-practices-act-enforcement-to-further-american-economic-and-national-security/); Department of Justice, *Foreign and Corrupt Practices Act Unit* (online at www.justice.gov/criminal/criminal-fraud/foreign-corrupt-practices-act) (accessed Feb. 16, 2025).

jeopardy[.]” and thus undermines companies’ “long-term interests and the best interests of their investors.”¹⁵

The President’s Executive Order followed an agency-wide memorandum from you on February 5, 2025, instructing DOJ staff that enforcement of the FCPA by DOJ’s Criminal Division will “shift focus away from investigations and cases” that do not involve drug cartels or transnational criminal organizations, raising concerns that DOJ will deprioritize enforcement of the FCPA against companies that commit bribery.¹⁶ Your memo also announced that three DOJ anti-kleptocracy initiatives that have been critical to the agency’s targeting and seizure of ill-gotten assets of corrupt foreign actors in several countries, including Russia and China, will be disbanded.¹⁷ A leading anti-corruption NGO has noted that the elimination of these initiatives “will significantly diminish the U.S.’s ability to counter the transnational corruption that continues to threaten core U.S. security and economic interests[.]”¹⁸

The Administration’s Attempted Purge of Inspectors General and Watchdog Agency Heads

DOJ’s actions are particularly alarming when viewed against the backdrop of other Administration actions that seek to remove institutional safeguards against corruption and malfeasance. During his first week in office, President Trump purported to fire 17 federal agency inspectors general, which have long played a critical role in rooting out corruption, safeguarding integrity, and promoting efficiency within the executive branch.¹⁹ Likewise, last week the President attempted to fire the Inspector General for the U.S. Agency for International Development, in apparent retaliation for that Inspector General’s report just one day prior, which criticized the Trump Administration’s illegal campaign to gut the agency.²⁰ Each of these purported firings was patently illegal, given the President’s failure to notify Congress 30 days prior to the attempted removals or provide “substantive rationale, including detailed and case-specific reasons” for the removals, as unambiguously required by the Inspector General Act of

¹⁵ *A Resource Guide to the U.S. Foreign Corrupt Practices Act* (2d ed.), Criminal Division, U.S. Department of Justice and Enforcement Division of the U.S. Securities and Exchange Commission, at 2 (online at www.justice.gov/criminal/criminal-fraud/file/1292051/dl?inline).

¹⁶ DOJ Memorandum Regarding Total Elimination of Cartels and Transnational Criminal Organizations at 4 (Feb. 5, 2025) (online at www.justice.gov/ag/media/1388546/dl?inline).

¹⁷ *Id.*

¹⁸ Press Release, *Attorney General Memorandum Redirects U.S. Anti-Corruption Efforts Raising Questions and Concerns*, Transparency International U.S. (Feb. 6, 2025) (online at <https://us.transparency.org/news/attorney-general-memorandum-raises-questions-around-enforcement-of-transnational-anti-corruption-laws/>).

¹⁹ *Trump Fires 17 Independent Watchdogs at Multiple Agencies in Late-Night Move*, ABC News (Jan. 25, 2025) (online at <https://abcnews.go.com/Politics/trump-fires-17-independent-watchdogs-multiple-agencies-late/story?id=118097873>); Letter from Democratic Members of Committee on Oversight and Government Reform to President Donald J. Trump (Feb. 3, 2025) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/evo-media-document/2025-02-03.%20GEC%20et%20al.%20to%20Trump%20re.%20Purge%20on%20the%20Federal%20Workforce.pdf>).

²⁰ *Trump Fires USAID Inspector General One Day After Blistering Report*, Washington Post (Feb. 11, 2025) (online at <https://www.washingtonpost.com/politics/2025/02/11/trump-fires-usaid-inspector-general/>).

1978, amended in 2022 with bipartisan support.²¹ Equally alarmingly, the Trump Administration's attempt to purge these critical checks on malfeasance in the federal government without good cause provides further cover for corruption in the executive branch.

Also earlier this month, President Trump purported to fire the head of the Office of Special Counsel, which investigates whistleblower reports from government employees and protects them from retribution, as well as the Director of the Office of Government Ethics (OGE), which investigates high-ranking federal officials in connection with violations of conflict of interest rules.²² Notably, President Trump moved to terminate the OGE Director after Congressional Democrats had urged both you and the Director to open an investigation into conflicts of interest stemming from Elon Musk's role at the U.S. DOGE Service while his companies hold billions of dollars in federal government contracts.²³ These purported firings were reportedly "met with widespread condemnation from former officials and good-government advocates, who called them an ominous indication of how Trump intends to flout the normal guardrails—and in some cases, federal law—that constrain public officials."²⁴

Information Requested

To determine the severity of the impact of these actions on DOJ's ability to investigate, prosecute, and deter domestic and foreign corruption, including, but not limited to, corruption by public officials in the U.S. and abroad, and whether legislation is necessary to address such impact, we request written responses to the following no later than March 7, 2025.

1. All communications concerning: (a) DOJ's decision to terminate the prosecution of Mayor Adams; (b) DOJ's decision to withdraw felony charges against Representative Fortenberry; (c) DOJ's decision to withdraw from the investigation concerning Representative Ogles; and (d) the pardon granted to former Governor Blagojevich.
2. Identify the number of investigations involving potential bribery of foreign officials and/or associated money laundering that have been paused or terminated following the President's February 10, 2025, Executive Order.

²¹ See Press Release, *Congress and the Courts Should Insist on Compliance with Federal Law*, New York City Bar Association (Feb. 10, 2025) (online at www.nycbar.org/press-releases/firings-of-inspectors-general-are-illegal-and-invalid/); Letter from Democratic Members of Committee on Oversight and Government Reform to President Donald J. Trump at 6 (Feb. 3, 2025) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/evo-media-document/2025-02-03.%20GEC%20et%20al.%20to%20Trump%20re.%20Purge%20on%20the%20Federal%20Workforce.pdf>).

²² *Trump Takes Aim at Officials Who Police Agency Wrongdoing, Protect Workers*, Washington Post (Feb. 13, 2025) (online at www.washingtonpost.com/politics/2025/02/13/trump-firings-watchdogs/).

²³ Letter from Democratic Members of U.S. House of Representatives Committee on the Judiciary to Attorney General Pamela Bondi and OGE Director David Huitema (Feb. 7, 2025) (online at https://ross.house.gov/_cache/files/b/7/b73e22b7-cb95-42d2-8ff7-e4eb5a3151f1/7D7EEB40C4C345844710558A4A3F5022.musk-letter-final-2.7.pdf).

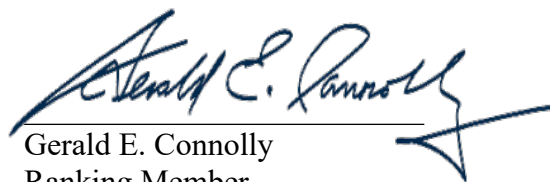
²⁴ *Trump Takes Aim at Officials Who Police Agency Wrongdoing, Protect Workers*, Washington Post (Feb. 13, 2025) (online at www.washingtonpost.com/politics/2025/02/13/trump-firings-watchdogs/).

3. Specify whether, and under what circumstances, a U.S. business engaging in bribery of a foreign official under the FCPA or other federal statute constitutes a “Transnational Criminal Organization” or “TCO” as set forth at page 4 of your February 5, 2025, memorandum regarding “Total Elimination of Cartels and Transnational Criminal Organizations.”
4. Specify (a) the number of investigations or judicial proceedings that were being pursued by DOJ’s Task Force KleptoCapture, Kleptocracy Team, and/or Kleptocracy Asset Recovery Initiative as of your February 5, 2025, memorandum, and (b) respectively, the number of those investigations or proceedings that involved assets linked to nationals of Russia and the People’s Republic of China.

The Committee on Oversight and Government Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate “any matter” at “any time” under House Rule X. The Committee on Oversight and Government Reform’s Subcommittee on Federal Law Enforcement is also specifically tasked with oversight of federal law and regulatory enforcement.²⁵ The Committee on the Judiciary has jurisdiction over “criminal law enforcement and criminalization” under House Rule X. The Committee on the Judiciary’s Subcommittee on Crime and Federal Government Surveillance has jurisdiction over the Federal Criminal Code, drug enforcement, sentencing, parole and pardons, internal and homeland security, the Federal Rules of Criminal Procedure, prisons and criminal law enforcement.

If you have any questions regarding this request, please contact Democratic Committee staff at (202) 225-5051.

Sincerely,

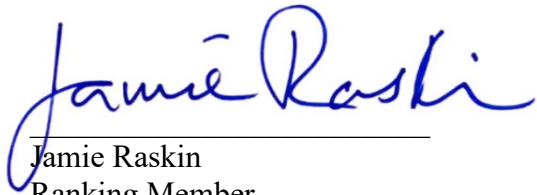


Gerald E. Connolly
Ranking Member
House Committee on Oversight and
Government Reform



Summer Lee
Ranking Member
Subcommittee on Federal
Law Enforcement

²⁵ Committee rule 6, clause (a)(1)(F).



Jamie Raskin
Ranking Member
House Committee on the Judiciary



Lucy McBath
Ranking Member
Subcommittee on Crime and Federal
Government Surveillance

cc: The Honorable James Comer, Chairman
House Committee on Oversight and Government Reform

The Honorable Jim Jordan, Chairman
House Committee on the Judiciary

The Honorable Clay Higgins, Chairman
Subcommittee on Federal Law Enforcement

The Honorable Andy Biggs, Chairman
Subcommittee on Crime and Federal Government Surveillance