



HOUSE COMMITTEE ON
OVERSIGHT AND ACCOUNTABILITY
DEMOCRATS

ROOM RATES MAY VARY: HOW DONALD TRUMP VIOLATED THE CONSTITUTION BY FLEEING TAXPAYERS WITH UNLAWFUL AND EXORBITANT HOTEL CHARGES

*A Glimpse Into President Trump's Domestic Emoluments Rackets
and Pay-to-Play Schemes*

October 18, 2024

STAFF REPORT

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EXECUTIVE SUMMARY

“The President shall, at stated Times, receive for his Services, a Compensation which shall neither be increased nor diminished during the Period for which he shall have been elected, and he shall not receive within that Period any other Emolument from the United States, or any of them.”

Constitution of the United States, Article II, § 1, cl. 7

“The legislature, on the appointment of a President, is once for all to declare what shall be the compensation for his services during the time for which he shall have been elected. This done, they will have no power to alter it, either by increase or diminution, till a new period of service by a new election commences. They can neither weaken his fortitude by operating on his necessities, nor corrupt his integrity by appealing to his avarice. Neither the Union, nor any of its members, will be at liberty to give, nor will he be at liberty to receive, any other emolument than that which may have been determined by the first act. He can, of course, have no pecuniary inducement to renounce or desert the independence intended for him by the Constitution.”

The Federalist No. 73 (Alexander Hamilton)

From the time he became a candidate and launched his campaign as “the greatest infomercial in political history,” Donald Trump has used the presidency—and his years-long pursuit of it—as the world’s greatest get-rich-quick scheme.¹

Earlier this year, the Democratic staff of the Committee on Oversight and Accountability released a staff report documenting the nearly \$8 million former President Trump received through just *four* of his businesses and over just parts of a two-year period from at least 20 foreign governments that sought—and in many cases received—favors from the Trump Administration.² This figure is clearly just a fraction of the total amount of unconstitutional

¹ Committee on Oversight and Reform, *Hearing with Michael Cohen, Former Attorney to President Donald Trump*, 116th Cong, Transcript at 14, 21–22 (Feb. 27, 2019) (online at www.congress.gov/116/chrg/CHRG-116hhrg35230/CHRG-116hhrg35230.pdf); *Cohen: Trump Described His Campaign As “The Greatest Infomercial in Political History,”* The Hill (Feb. 27, 2019) (online at <https://thehill.com/homenews/house/431802-cohen-trump-described-his-campaign-as-the-greatest-infomercial-in-political/>); *Trump Cashes in During Final Weeks of His Presidential Campaign*, Washington Post (Sept. 8, 2024) (online at www.washingtonpost.com/politics/2024/09/08/trump-cash-merchandise-books-cards/).

² Committee on Oversight and Accountability, Democrats, *Press Release: Oversight Democrats Release Report Proving Trump Pocketed Millions from at Least 20 Foreign Governments as President* (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/news/press-releases/oversight-democrats-release-report-proving-trump-pocketed-millions-from-at-least>); Minority Staff, Committee on Oversight and Accountability, *White House for Sale: How Princes, Prime Ministers, and Premiers Paid Off President Trump* (hereinafter “Foreign Emoluments Report”) (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2024-01-04.COA%20DEMS%20-%20Mazars%20Report.pdf>).

foreign emoluments President Trump collected while in office—a total that still needs to be fully accounted for.³

This follow-up report is based on a single set of records: guest logs for *a single Trump property*, Donald Trump’s Trump International Hotel in Washington, D.C., covering just an *11-month period* between September 2017 and August 2018 (excluding July 2018). Thus, the results would presumably represent less than one-quarter of Trump’s ill-gotten gains from a *single* hotel over the course of his four-year term. While this is an exceedingly small window into the opaque web of more than 500 corporations, limited liability companies, and trusts that Donald Trump carried with him into the presidency, it is enough to reveal hundreds of unconstitutional and ethically suspect payments he accepted while in office from *domestic* sources—including a federal agency, numerous federal and state officials, and individuals who sought, and frequently obtained, federal offices as well as presidential pardons from him.

One source of payments discussed in this report is the U.S. Secret Service, which Donald Trump treated as his own personal government ATM, extracting from it exorbitant rates his hotel imposed *while* Secret Service agents protected him, his children, and even foreign leaders whose own payments received by Trump violated the Constitution’s *Foreign* Emoluments Clause. Not only did President Trump’s hotel often charge the Secret Service far more than authorized federal government rates, the hotel also charged the agency far more than hundreds of other patrons, including members of a foreign royal family and a Chinese business interest. By accepting the payments that he imposed on the Secret Service, former President Trump violated the Constitution’s *Domestic* Emoluments Clause—which provides that a president may not receive any payments from the federal government other than a salary. To be clear, this report does not in any way question the critical importance of ensuring that the Secret Service has the funding and resources necessary to fulfill its no-fail mission of keeping its protectees, including presidents and presidential candidates, safe. Instead, this report is focused on ensuring that the taxpayer funds appropriated to the Secret Service are expended to support its protective missions—not to violate the Constitution by lining the president’s pockets.

This report also discusses payments made by federal and state officials staying at the hotel, as well as individuals who sought—and often obtained—favours from President Trump, including federal jobs in Trump’s Administration and presidential pardons. From among the dozens of examples recorded in just 11 months of the Trump hotel’s guest logs, this report highlights 30, including ambassadors and other executive branch officials, judges, state officials, and convicted criminals who received pardons from former President Trump. Of these 30, more than half—16—paid President Trump’s hotel while they served as federal or state officials, often

³ For example, in September 2024, CREW released a report that “builds” on the Committee’s January 2024 Democratic Staff report on foreign emoluments. The CREW report “pieced together additional details” indicating that former President Trump “likely benefited from \$13.6 million in payments from foreign governments”—a number which may still be far short of the total figure. Citizens for Responsibility and Ethics in Washington, *Trump Likely Benefited from \$13.6 Million in Payments from Foreign Governments During His Presidency* (Sept. 17, 2024) (online at www.citizensforethics.org/reports-investigations/crew-reports/trump-likely-benefited-from-13-6-million-in-payments-from-foreign-governments-during-his-presidency/).

while on official travel, and therefore violated the Domestic Emoluments Clause to the extent they used any taxpayer funds to make these payments.⁴

Giving new meaning to the term “petty cash,” most of the payments discussed in this report were small—and their cumulative total is just over \$300,000. What is shocking is not the size of these payments but the fact that even the narrowest of windows into President Trump’s business dealings—just 11 months at one hotel—reveals a menagerie of unethical transactions, including flat-out violations of the Constitution. Just as his hotels were used to shake down foreign governments and monarchs, they were used also to fleece American taxpayers. Each transaction illustrates how President Trump used the presidency—the office which is charged by the Constitution to “take Care that the Laws be faithfully executed”—to line his own pockets in violation of the law and often at the direct expense of American taxpayers who were paying for the party.

Each of the more than 500 business entities that President Trump chose to retain as President—a break from the precedent set by *every* other President and a choice denounced by government ethics experts from across the political spectrum—served as an avenue through which he could accept and demand unconstitutional, illegal, and unethical payments.⁵ The transactions profiled in this report show that he did all three on a nearly daily basis as he bilked the Secret Service and pocketed tribute payments from people serving his Administration or seeking his favor.

Former President Trump was very clear that he did not believe that the Constitution’s prohibitions on either foreign or domestic emoluments applied to him. For example, in 2019, when public outrage forced him to reverse his plan to hold the following year’s G7 summit at his “foundering Doral resort,” he publicly denigrated what he called the “phony Emoluments Clause.”⁶ He also tried to cast the criticism he received—including from conservative outlets like *Fox News*—as simply the baseless ravings of his political opponents, tweeting, for example:

⁴ The limited records produced to the Committee by Mazars do not reveal payment details or guest information beyond the names of the individuals who booked stays at the Trump International Hotel in Washington, D.C., during an 11-month period between September 2017 and August 2018. It is therefore impossible, on the basis of these records, to definitively establish which stays were paid with taxpayer funds. The Committee’s Democratic staff undertook a review of publicly available information—including reports of stays at the hotel, specifically, or of travel in Washington, D.C., generally—to confirm likely reasons for the visits discussed in this report.

⁵ *Ethics Advocates Warn Trump That He Needs to Do More to Divest from Family Business*, Washington Post (Jan. 2, 2017) (online at www.washingtonpost.com/news/post-politics/wp/2017/01/02/ethic-advocates-warn-trump-that-he-needs-to-do-more-to-divest-from-family-business/). Letter from Ambassador (ret.) Norm Eisen, et. al. to President-elect Donald J. Trump (Jan. 2, 2017) (online at www.democracy21.org/wp-content/uploads/2017/01/Letter-to-Trump-conflicts-of-interest-1-2-17.pdf). Then-Ranking Member Cummings hosted a forum in December 2016 with bipartisan ethics experts who addressed the unprecedented conflicts faced by then-President-Elect Trump. Committee on Oversight and Government Reform, Democrats, *Press Release: Cummings to Host Forum with Bipartisan Ethics Experts on Trump’s Conflicts of Interest* (Dec. 13, 2016) (online at <https://oversightdemocrats.house.gov/news/press-releases/cummings-to-host-forum-with-bipartisan-ethics-experts-on-trump-s-conflicts-of-0>); *Trump’s ‘Unconstitutional’ Business Plan ‘Reeks,’ Former Presidential Lawyers Say*, Government Executive (Dec. 14, 2016) (online at www.govexec.com/oversight/2016/12/trumps-unconstitutional-business-plan-reeks-former-presidential-lawyers-say/133904/).

⁶ *Trump Blasts “Phony Emoluments Clause” in Post-Doral Meltdown*, Vanity Fair (Oct. 21, 2019) (online at www.vanityfair.com/news/2019/10/trump-g7-doral-emoluments-clause-phony).

“Therefore, based on both Media & Democrat Crazy and Irrational Hostility, we will no longer consider Trump National Doral, Miami, as the Host Site for the G-7 in 2020.”⁷

And far from expressing contrition for cashing in on the presidency, Donald Trump has made explicit his intent to expand his commodification of federal office if re-elected—including by gutting the federal civil service and replacing professional, expert, nonpolitical federal employees with a cadre of yes-men, sycophants, and loyalists. Specifically, he has proposed implementing an expansive new category of political appointments under what the former Trump Administration called “Schedule F.” First created by executive order in the final months of Donald Trump’s presidency, Schedule F was to be a new category of federal employees who would be excepted from the competitive civil service and instead would serve at the pleasure of the President.⁸ By design, implementation of Schedule F would enable Donald Trump to literally sell out and sell off tens of thousands of federal positions currently filled by career civil servants—creating what former President Trump’s own Associate Director of the Office of Management and Budget, Robert Shea, called “an army of suck-ups” broadening and entrenching the corruption that defined the Trump Administration.⁹

The payments discussed in this report—drawn from less than a year’s worth of records covering a single Trump property—are a stark reminder that nearly four years after the end of the Trump Administration, we know about millions in illegal payments Donald Trump accepted as Commander-in-Chief, but we still lack a complete inventory of the money that flowed through the hundreds of business entities President Trump used as an ATM for his self-enrichment.

But more critically, these payments demonstrate how willfully and brazenly Donald Trump violated the Constitution he was sworn to uphold when he wanted to sell out the interests of the American people for private gain. They demand urgent congressional action to enforce the Constitution’s Domestic Emoluments Clause as well as the Foreign Emoluments Clause and expand anti-corruption statutes to prevent any future occupant of the White House from using the powers of the Oval Office to line their own pockets the way Donald Trump did. The United States Treasury is not the personal piggybank of the President.

⁷ Donald J. Trump, (@realDonaldTrump), X (Oct. 19, 2019) (online at <https://x.com/realDonaldTrump/status/1185735579327193093>); *Fox News Editor Stunned by Trump’s Doral Decision: ‘The World is on Fire. Why!? It Is Beyond My Imagination’*, MEDIAite (Oct. 17, 2019) (online at www.mediaite.com/news/fox-news-editor-stunned-by-trumps-doral-decision-the-world-is-on-fire-why-it-is-beyond-my-imagination/).

⁸ The White House, *Executive Order on Creating Schedule F in the Excepted Service* (Oct. 21, 2020) (online at <https://trumpwhitehouse.archives.gov/presidential-actions/executive-order-creating-schedule-f-excepted-service/>); *Trump Is Threatening the Return and Expansion of Schedule F*, Government Executive (Mar. 14, 2022) (online at www.govexec.com/workforce/2022/03/trump-threatening-return-and-expansion-schedule-f/363145/).

⁹ *What Trump’s War on the “Deep State” Could Mean: “An Army of Suck-Ups,”* CNN (Apr. 27, 2024) (online at www.cnn.com/2024/04/27/politics/trump-federal-workers-2nd-term-invs/index.html); see also Committee on Oversight and Accountability, Democrats, *Press Release: Ranking Member Raskin’s Opening Remarks During Hearing with OMB Director* (Apr. 30, 2024) (online at <https://oversightdemocrats.house.gov/news/press-releases/ranking-member-raskins-opening-remarks-during-hearing-omb-deputy-director>).

BACKGROUND

Committee Democrats Have Been Trying for Eight Years to Expose the Full Extent of How Then-President Donald Trump Converted the Government into a Shakedown Operation for Funneling Corrupt and Unconstitutional Payments into His Pockets

For approximately eight years, the Democratic Members of the Oversight Committee have been investigating how former President Trump commodified his presidency. The investigation began in the days after the 2016 presidential election, when Representative Elijah E. Cummings, then-Ranking Member of the Committee on Oversight and Government Reform (subsequently renamed the Committee on Oversight and Reform and then the Committee on Oversight and Accountability) raised urgent concerns that Mr. Trump’s complex and opaque business interests could imperil the accountability and transparency of the Executive Branch as well as national security.¹⁰

In April 2017, the Republican-led Committee sent a bipartisan letter to The Trump Organization requesting documents and information about its processes for identifying payments from foreign governments and entities they control. After The Trump Organization failed to provide responsive documents, the Committee identified Mazars, Donald Trump’s former accounting firm, as a possible custodian of relevant documents.¹¹ On April 15, 2019, after a negotiation and consultation process, then-Chairman Cummings issued a subpoena to Mazars.¹²

Then-President Trump objected to the production of those records by Mazars, and in April 2019, his personal attorneys filed suit in the U.S. District Court for the District of Columbia to block Mazars from producing responsive documents.¹³ The Committee then engaged in 15 months of litigation with The Trump Organization to enforce the subpoena, all the

¹⁰ Letter from Ranking Member Elijah E. Cummings, Committee on Oversight and Government Reform, to Chairman Jason Chaffetz, Committee on Oversight and Government Reform (Nov. 14, 2016) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/documents/2016-11-14.EEC%20to%20JC%20%28003%29.pdf>).

¹¹ For more detail concerning the Committee’s request and the inadequacy of The Trump Organization’s responses, see Foreign Emoluments Report, *supra* note 3 at 33–35.

¹² See Memorandum from Chairman Elijah E. Cummings, Committee on Oversight and Reform, to Members of the Committee, *Notice of Intent to Issue Subpoena to Mazars USA LLP* (Apr. 12, 2019) (online at www.politico.com/f/?id=0000016a-131f-da8e-adfa-3b5f319d0001).

¹³ *Trump v. Committee on Oversight & Reform of the U.S. House of Representatives*, 380 F. Supp.3d 75 (D.D.C. 2019). The plaintiffs’ complaint originally named then-Chairman Cummings and the Committee’s then-Chief Investigative Counsel, and Mazars as defendants, but following discussions with the Committee, the plaintiffs consented to the Committee’s intervention as a defendant and agreed to dismiss Chairman Cummings and the Chief Investigative Counsel from the action. See also Committee on Oversight and Accountability, Democrats, *Press Release: Oversight Democrats Release Report Proving Trump Pocketed Millions from at Least 20 Foreign Governments as President* (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/news/press-releases/oversight-democrats-release-report-proving-trump-pocketed-millions-from-at-least>); Minority Staff, Committee on Oversight and Accountability, *White House for Sale: How Princes, Prime Ministers, and Premiers Paid Off President Trump* (hereinafter “Foreign Emoluments Report”) (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2024-01-04.COA%20DEMS%20-%20Mazars%20Report.pdf>).

way up to the U.S. Supreme Court, which affirmed the Committee’s power to obtain the President’s personal information pursuant to its oversight powers and remanded the case to the U.S. District Court to evaluate the subpoena under a four-factor test the Supreme Court formulated for subpoenas issued to a sitting President.¹⁴ The District Court and U.S. Court of Appeals subsequently modified but upheld the Committee’s subpoena under that test.¹⁵

On August 29, 2022, after the Committee’s successive court victories, The Trump Organization, the Committee, and Mazars reached a three-way agreement for Mazars to begin producing documents under the narrowed subpoena.¹⁶ Pursuant to this court-supervised agreement, Mazars began producing documents to the Committee in September 2022, beginning with documents relating to the Old Post Office building in Washington, D.C., and The Trump Organization’s lease of that property, under which it operated as the former Trump International Hotel in Washington, D.C.

Almost immediately after Republicans took the majority in the House of Representatives in 2023, they returned to their strategy of total obstruction to keep the American people from getting the facts. Donald Trump’s personal attorneys, working in concert with new Committee Chairman James Comer, informed Mazars that it was no longer required to comply with its obligation to produce additional documents under the subpoena, notwithstanding the ongoing court-supervised settlement agreement.¹⁷ In June 2023, the Committee—at Chairman Comer’s direction—and the parties to the litigation filed a joint motion for dismissal and termination of the case. The District Court granted the motion on July 5, 2023, ending the litigation and the Court’s supervision of the parties’ agreement.¹⁸ In working with Donald Trump’s attorneys to halt the production of documents only months after it started, Chairman Comer actively buried

¹⁴ *Trump v. Mazars USA, LLP*, 140 S. Ct. 2019 (2020). For additional detail concerning the Mazars litigation and its procedural history, see Foreign Emoluments Report, *supra* note 2 at 35–37.

¹⁵ *Trump v. Mazars USA, LLP*, 39 F.4th 775 (D.C. Cir. 2022); *Trump v. Mazars USA, LLP*, 560 F. Supp.3d 47 (D.D.C. 2021).

¹⁶ See Stipulated Agreement, attached as Exhibit A to Order, *Donald J. Trump, et al. v. Committee on Oversight and Reform of the U.S. House of Representatives, et al.*, Civil Action No. 1:19-cv-01136-APM (D.D.C. Sept. 11, 2022).

¹⁷ On January 19, 2023, a lawyer for Donald Trump wrote to Mazars’s counsel: “I do not know the status of Mazars [*sic*] production, but my understanding is that the Committee has no interest in forcing Mazars to complete it and is willing to release it from further obligations under the settlement agreement.” Email from Patrick Strawbridge, Consovoy McCarthy PLLC, on behalf of Donald Trump, to Counsel for Mazars USA LLP, (Jan. 19, 2023). In subsequent communications with Mazars’s counsel, Trump’s personal attorney confirmed that the Acting General Counsel of the House of Representatives, in his capacity as counsel to the Committee, had informed him that Mazars no longer needed to comply with the subpoena. Email from Patrick Strawbridge, Consovoy McCarthy PLLC, on behalf of Donald Trump, to Counsel for Mazars USA LLP, (Jan. 20, 2023); see also Foreign Emoluments Report, *supra* note 3 at 37–38. For details on Chairman Comer’s efforts to obstruct inquiries into former President Trump’s conduct, see Letter from Ranking Member Jamie Raskin, Committee on Oversight and Accountability, to Chairman James Comer, Committee on Oversight and Accountability (Mar. 12, 2023) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/FINAL%202023.03.12.%20JBR%20to%20Comer%20re%20Mazars%20BofA%20Subpoena.pdf>).

¹⁸ See Order, *Trump v. Committee on Oversight and Accountability of the U.S. House of Representatives, et al.*, Civil Action No. 1:19-cv-01136-APM (D.D.C. July 5, 2023); see also Foreign Emoluments Report, *supra* note 3 at 37–38.

further evidence of former President Trump’s misconduct by depriving the Committee’s Democratic staff of the ability to work with Mazars to conduct further searches for responsive records.

The Domestic Emoluments Clause

This report discusses payments made by a federal agency which are clear violations of the Constitution’s Domestic Emoluments Clause. In addition, this report profiles payments by individuals who were serving as federal or state officials and, in many cases, staying at President Trump’s Washington, D.C., hotel while on official travel. To the extent any of their payments were made using federal or state taxpayer funds, they also violated the Domestic Emoluments Clause.

The Constitution’s Domestic Emoluments Clause provides:

The President shall, at stated Times, receive for his Services, a Compensation which shall neither be increased nor diminished during the Period for which he shall have been elected, and he shall not receive within that Period any other Emolument from the United States, or any of them.¹⁹

Like the Foreign Emoluments Clause, the Framers added the Domestic Emoluments Clause to the Constitution to address their acute and overriding fear that the corruption they had experienced under the British monarchy would take root in the powerful new Executive Branch established in the Constitution. As three leading scholars have explained:

[O]nly recently had the states thrown off the yoke of a king who had sought “an absolute Tyranny” over them, making the “temper of the people,” in the view of some delegates at Philadelphia, “adverse to the very semblance of Monarchy.”

These concerns mingled with a deep fear of corruption among public officials. Born of their experience with Britain and their knowledge of history, the Framers were “obsessed with corruption.” ... The Framers understood that men are not angels, and they were acutely aware of the danger that the leaders of this new government would put their own pecuniary interests above those of the nation. George Mason crystallized these concerns by warning the delegates that “if we do not provide against corruption, our government will soon be at an end.”²⁰

The Domestic Emoluments Clause provides that the president may receive only a fixed “Compensation” that can neither be “increased nor diminished” during a term of office. Importantly, unlike the Foreign Emoluments Clause, the Domestic Emoluments Clause is written

¹⁹ U.S. Const., art. II, § 1, cl. 7.

²⁰ Brianne J. Gorod, Brian R. Frazelle, and Samuel Houshower, *The Domestic Emoluments Clause: Its Text, Meaning, and Application to Donald J. Trump* at 3 (July 2017) (online at www.theconstitution.org/wp-content/uploads/2017/07/20170726_White_Paper_Domestic_Emoluments_Clause.pdf) (quoting The Records of the Federal Convention of 1787, at 88 (Max Farrand ed., 1911) and Zephyr Teachout, *The Anti-Corruption Principle*, 94 CORNELL L. REV. 341, 348 (2009)).

as an absolute prohibition. Whereas federal officials may seek Congress’s consent to accept a gift or an emolument offered by a foreign government, the Domestic Emoluments Clause—which applies only to presidents—contains no such exception. Rather, it creates a clear and unconditional prohibition on the president receiving any payments—other than formal “Compensation”—from the federal government or the states. Under no circumstances can the president collect payments from the federal government or a state outside of his or her official salary.

As understood by the Framers and reaffirmed by the federal courts and the Executive Branch, within the Foreign and Domestic Emoluments Clauses, the term “emoluments” encompasses not only payments or other benefits arising directly from holding a federal office but also nominally “private” market transactions where the president acts as a businessperson selling this or that service or good to the U.S. or foreign states or monarchs.²¹ In separate lawsuits arising from Donald Trump’s myriad violations of the Foreign and Domestic Emoluments Clauses, two federal courts concluded that, consistent with the historical understanding, the term “emoluments” as used in the Constitution encompasses such private market transactions.²² Notably, one of those courts succinctly explained the relevance of the Clauses to the glaring conflicts of interest posed by foreign and domestic government patronage of Donald Trump’s hotels:

Where, for example, a President maintains a premier hotel property that generates millions of dollars a year in profits, how likely is it that he will not be swayed, whether consciously or subconsciously, in any or all of his dealings with foreign or domestic governments that might choose to spend large sums of money at that hotel property? ... The Framers of the [Foreign and Domestic Emoluments] Clauses made it simple. Ban the offerings altogether (unless, in the foreign context at least, Congress sees fit to approve them).²³

Notwithstanding the simplicity of the Framers’ design to ensure that the nation’s chief executive governs in the nation’s interest alone, Donald Trump systematically ignored and denigrated this bedrock constitutional command throughout his presidency.

In addition to violating the Domestic Emoluments Clause by creating a ready conduit to put federal and state government money into his pocket, former President Trump also violated—in spirit and possibly in letter—the broader constitutional and statutory anti-corruption

²¹ See, e.g., Brianne J. Gorod, Brian R. Frazelle, and Samuel Houshower, *The Domestic Emoluments Clause: Its Text, Meaning, and Application to Donald J. Trump* (July 2017) (online at www.theconstitution.org/wp-content/uploads/2017/07/20170726_White_Paper_Domestic_Emoluments_Clause.pdf).

²² See *Blumenthal v. Trump*, 373 F. Supp. 3d 191, 196-207 (D. Md. 2019); *Dist. of Columbia v. Trump*, 315 F. Supp. 3d 875, 886-904 (D.D.C. 2018). The U.S. Court of Appeals in *Blumenthal* subsequently vacated the District Court’s decision on the ground that individual Members of Congress lacked standing to bring claims under the Foreign and Domestic Emoluments Clauses, 949 F.3d 14 (D.C. Cir. 2020). In *Dist. of Columbia v. Trump*, the U.S. Supreme Court ultimately ordered the case dismissed as moot after President Biden was sworn into office. 141 S. Ct. 1262 (2021). Neither of those appellate courts exonerated Mr. Trump, and both left the District Court’s determinations as to the definition of “emolument.”

²³ *Dist. of Columbia v. Trump*, 315 F. Supp. 3d at 898.

framework, carefully and deliberately designed by the Framers and Congress over the course of the nation’s history to prevent federal officials, Members of Congress, and the president from financially profiting from their offices beyond their official salaries.²⁴

Report Methodology and Document Limitations

This report is based on analysis by the Committee’s Democratic staff of the following documents:

- A limited set of documents produced by Mazars recording nightly room rentals at former President Trump’s Trump International Hotel in Washington, D.C., titled “Posting Journal Reports,” which cover the months between September 2017 and August 2018, inclusive, except for July 2018, and a handful of other documents produced by Mazars, including ledgers from each of December 2016 and December 2017 recording advance deposits for the years ahead as well as charges accrued by several closed accounts;
- A limited set of documents produced by the U.S. Secret Service regarding payments to Trump-owned properties in the United States; and
- Public documents and media reports.

Mazars Documents

Before Chairman Comer unilaterally terminated Mazars’s obligation to produce documents to the Committee, the company had produced two main types of documents recording customer expenditure information at the Trump International Hotel in Washington, D.C.— records of room rentals on certain nights, and a few records recording point-in-time information

²⁴ *E.g.*, Pendleton Act (1883), National Archives (online at www.archives.gov/milestone-documents/pendleton-act) (ending the “spoils system” by requiring that the vast majority of federal jobs be awarded based on merit and making it unlawful to fire or demote covered employees for political reason); Hatch Act (1939), 5 U.S.C. §§ 7323-7324 (prohibiting federal employees from using their “official authority or influence” to affect elections or to solicit, accept, or receive campaign contributions); Hobbs Act (1946), 18 U.S.C. § 1951; Federal Election Campaign Act (1971), 52 U.S.C. § 30101 *et seq.* (reforming political campaign fundraising and spending by imposing contribution limits, source restrictions including a “pay-to-play” prohibition against the acceptance or solicitation of donations from federal contractors, and disclosure requirements, as well as by prohibiting the conversion of campaign funds for personal use); 18 U.S.C. § 201 (criminal prohibition on bribery of public official); 18 U.S.C. § 1346 (criminal prohibition on honest services fraud); 18 U.S.C. § 208 (criminal prohibition on executive branch officers and employees—excluding the president or vice president—from participating personally and substantially in official matters in which they, close family members, or entities with which they have a close association have a financial interest); 18 U.S.C. § 210 (criminal prohibition on payments or “promises [of] any money or thing of value” in exchange for “the use or promise to use any influence” to obtain a federal appointive office or position); 5 U.S.C. § 7351 (prohibiting federal employees from giving gifts to superiors or accepting gifts from employees receiving less pay than themselves); 5 U.S.C. § 7353 (prohibiting federal officers or employees from “solicit[ing] or accept[ing] anything of value” from persons “seeking official action from, doing business with, or ... conducting activities regulated by” the individuals agency or persons whose “interests may be substantially affected” by the performance or nonperformance of the officer or employee’s official duties); U.S. Office of Government Ethics, *Standards of Ethical Conduct for Employees of the Executive Branch* (Jan. 1, 2017) (online at www.oge.gov/web/oge.nsf/Resources/Standards+of+Ethical+Conduct+for+Employees+of+the+Executive+Branch).

on some customers' accounts (including accounts that had overdue balances or that had been paid off).

The primary documents on which this report relies are called Posting Journal Reports—essentially, room records of day-to-day room rentals at the Trump International Hotel in Washington, D.C. These documents record the names of the persons or entities that rented rooms at former President Trump's D.C. hotel and the rates charged for those rooms, among other information. They do not, however, record the sources of the payments made for rooms.

Secret Service Documents

As part of its investigation, the Committee requested that the U.S. Secret Service provide documentation of all of its expenditures at Trump-owned properties, as well as an accounting of all expenditures in excess of the General Services Administration's (GSA) authorized lodging rates, known as per diem rates.²⁵ In response to this request, the U.S. Secret Service produced to the Committee a spreadsheet detailing \$1.4 million in agency spending at Trump-owned properties in the United States and 41 documents—including several completed forms entitled "Request for GSA Lodging Variance" as well as email exchanges—internally approving requests from Secret Service field offices to pay Trump-owned properties more than the applicable per diem rates.²⁶

As discussed below, it is clear that this set of records fails to account for *all* Secret Service spending at Trump-owned properties and likely reflects only a fraction of the instances in which Trump-owned properties demanded—and received—from the Secret Service payments well in excess of the government per diem rate.

In responding to the Committee, the Secret Service represented that it "adheres to the Government-wide Federal Travel Regulation (FTR), where the General Services Administration (GSA) implements statutory requirements and Executive Branch policies for travel by Federal employees." The Secret Service explained that, consistent with such adherence, its field offices "are responsible for completing a Request for GSA Lodging Variance, for all in-district lodging that exceeds the GSA lodging rate."²⁷ Yet it is clear that the Secret Service was routinely charged far in excess of authorized per diem rates at Trump-owned properties—and the agency

²⁵ GSA's calculations of per diem rates are based on average daily rates—less 5%—of hotels that are selected to represent mid-range properties. Per diems vary by location and season. U.S. General Services Administration, *Factors Influencing Lodging Rates* (July 22, 2024) (online at www.gsa.gov/travel/plan-a-trip/per-diem-rates/factors-influencing-lodging-rates).

²⁶ Letter from Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform, to Director Kimberly A. Cheatle, U.S. Secret Service (Oct. 17, 2022) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2022-10-17.CBM%20to%20Cheatle-USSS%20re%20Exorbitant%20Charges%20at%20Trump%20Properties.pdf>).

²⁷ U.S. Secret Service, Coordinated Response to a Request for Information from the Committee on Oversight and Reform (June 30, 2022) (on file with the Committee).

often paid these charges without seeking prior authorization or otherwise keeping a record of the above-market prices it paid at Trump properties.²⁸

Important details were redacted from the waiver documents requesting authorization to make payments above the authorized per diem rate produced to the Committee by the Secret Service—including the number of rooms each waiver covered—but it appears that, at most, the waivers collectively cover some of the Secret Service’s lodging expenses on 123 days spanning the Trump Administration as well as parts or all of three consecutive months in 2021 after former President Trump left office. The waivers cover expenditures at just three Trump-owned properties: the Trump International Hotel in Washington, D.C.; Mar-a-Lago in Palm Beach (Florida); and Trump National Golf Club in Jupiter (Florida).²⁹ The Secret Service did not, for example, provide a single document approving expenditures above per diem from the New York field office, despite the presence of numerous properties in New York in which former President Trump has stakes, such as Trump Tower—at which President Trump and members of his family routinely stayed—as well as the Trump International Hotel and Tower, and the Trump World Tower, among others.³⁰ And it is clear that even for the properties for which the Secret Service was able to provide *some* waivers, these waivers covered only some of the above-per diem expenditures at those properties.³¹

What the records available to the Committee do make crystal clear is that then-President Trump treated the Secret Service as an ATM. His hotel repeatedly extracted prohibited domestic emoluments from the agency—and, at times, charged as much as 300% or more above the authorized government per diem. Not only did former President Trump’s D.C. hotel routinely charge the Secret Service more than the government rate, it frequently charged the Secret Service more than it did other patrons, including members of a foreign royal family and a Chinese business interest.

²⁸ The Secret Service’s appropriation measures allow the agency certain unique flexibilities, including the ability to override GSA’s expenditure caps for agents’ travel under certain circumstances. However, these flexibilities in no way excuse the Secret Service’s failure to properly account for its spending at Trump-owned properties. To the contrary, they underscore how problematic it is that a federal agency failed to account for unconstitutional payments to the President’s hotels, often paid in amounts significantly in excess of market rates. *See, e.g.*, Pub. L. No. 115-31, div. F., tit. II.

²⁹ U.S. Secret Service, Requests for GSA Lodging Variance (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

³⁰ *What Real Estate Does Trump Own in NYC Anyway?*, Curbed (Mar. 25, 2024) (online at www.curbed.com/article/trump-lawsuit-real-estate-nyc-property-letitia-james.html).

³¹ Letter from Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform, to Director Kimberly A. Cheatle, U.S. Secret Service (Oct. 17, 2022) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2022-10-17.CBM%20to%20Cheatle-USSS%20re%20Exorbitant%20Charges%20at%20Trump%20Properties.pdf>).

PART I: THE UNCONSTITUTIONAL ART OF THE SELF-DEAL: HOW TRUMP’S HOTEL TOOK THE SECRET SERVICE TO THE CLEANERS WHILE PRETENDING ITS AGENTS WOULD STAY FOR FREE

The Secret Service, which is a component of the Department of Homeland Security, is responsible for protecting the President, Vice President, their families, major candidates for these offices, former Presidents, visiting heads of foreign governments, and certain other senior officials.³² In order to fulfill its duties, the Secret Service must, of course, maintain physical proximity to its protectees at all times. Thus, whenever former President Trump or his family members—or foreign heads of state who were paying former President Trump constitutionally prohibited foreign emoluments—stayed at a Trump-owned or branded property, as Donald Trump usually insisted, the Secret Service rented rooms at those same properties.

Throughout the Trump Administration, The Trump Organization attempted to downplay the amount of Secret Service spending at its properties. In 2019, for example, Eric Trump claimed that the members of former President Trump’s government entourage—an entourage that would obviously include the Secret Service agents assigned to protect him—“stay at our properties for free.”³³ However, the room records from the Trump International Hotel in Washington, D.C., produced to the Committee by Mazars make clear that this property treated the Secret Service not as a *gratis* friend and guest but as a “captive customer,” using the agency as a fabulously wealthy sucker for whom price was no object, and an ATM to fill empty rooms—often charging rates far above the government per diem for these rooms.³⁴ And, under former President Trump’s Administration, the Secret Service obliged, routinely paying the rates former President Trump’s D.C. hotel demanded and failing to keep complete records. According to the room records Mazars produced to the Committee covering 11 of the 12 months between September 2017 and August 2018, the Secret Service paid for more than 200 rooms at former President Trump’s D.C. hotel on approximately 50 separate nights during that time frame.³⁵ The

³² 18 U.S.C. § 3056.

³³ *G-7 at Trump Golf Resort Saves the US Money: Eric Trump*, Yahoo!Finance (Oct. 17, 2019) (online at <https://finance.yahoo.com/news/g-7-at-trump-golf-resort-saves-the-us-money-eric-trump-192655739.html>).

³⁴ *Trump’s Company Billed the Government at Least \$2.5 Million. Here Are the Key Charges.*, Washington Post (Oct. 27, 2020) (online at www.washingtonpost.com/politics/key-charges-trump-properties/2020/10/27/bfa39b08-16cd-11eb-82db-60b15c874105_story.html).

³⁵ MAZARS-OVERSIGHT_COMMITTEE-00018271; MAZARS-OVERSIGHT_COMMITTEE-00018278; MAZARS-OVERSIGHT_COMMITTEE-00018279; MAZARS-OVERSIGHT_COMMITTEE-00018288; MAZARS-OVERSIGHT_COMMITTEE-00018309; MAZARS-OVERSIGHT_COMMITTEE-00018318; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018337; MAZARS-OVERSIGHT_COMMITTEE-00018659; MAZARS-OVERSIGHT_COMMITTEE-00018669; MAZARS-OVERSIGHT_COMMITTEE-00018771; MAZARS-OVERSIGHT_COMMITTEE-00018772; MAZARS-OVERSIGHT_COMMITTEE-00018916; MAZARS-OVERSIGHT_COMMITTEE-00018920; MAZARS-OVERSIGHT_COMMITTEE-00018925; MAZARS-OVERSIGHT_COMMITTEE-00018930; MAZARS-OVERSIGHT_COMMITTEE-00028729; MAZARS-OVERSIGHT_COMMITTEE-00028734; MAZARS-OVERSIGHT_COMMITTEE-00028739; MAZARS-OVERSIGHT_COMMITTEE-00028748; MAZARS-OVERSIGHT_COMMITTEE-00028759; MAZARS-OVERSIGHT_COMMITTEE-00028768; MAZARS-OVERSIGHT_COMMITTEE-00028806; MAZARS-OVERSIGHT_COMMITTEE-00028811; MAZARS-OVERSIGHT_COMMITTEE-00028812; MAZARS-OVERSIGHT_COMMITTEE-00028817; MAZARS-OVERSIGHT_COMMITTEE-00028998; MAZARS-OVERSIGHT_COMMITTEE-00028999; MAZARS-OVERSIGHT_COMMITTEE-00029006; MAZARS-OVERSIGHT_COMMITTEE-

Secret Service paid rates far above the authorized government per diem rate for at least 49 of these rooms.³⁶

Secret Service spending at President Trump’s Washington, D.C., hotel represented just a small fraction of the \$1.4 million the Secret Service has reported spending at former President Trump’s U.S.-based properties. In turn, the \$1.4 million reported by the Secret Service is itself only a fraction of the total amount of money that U.S. taxpayers paid to former President Trump’s businesses, in the U.S. *and abroad*, during his term in office. In October 2020, the *Washington Post* reported that, based on its review of “federal spending records,” as of that date,

00029007; MAZARS-OVERSIGHT_COMMITTEE-00029011; MAZARS-OVERSIGHT_COMMITTEE-00029012; MAZARS-OVERSIGHT_COMMITTEE-00029155; MAZARS-OVERSIGHT_COMMITTEE-00029186; MAZARS-OVERSIGHT_COMMITTEE-00029195; MAZARS-OVERSIGHT_COMMITTEE-00029202; MAZARS-OVERSIGHT_COMMITTEE-00029218; MAZARS-OVERSIGHT_COMMITTEE-00029229; MAZARS-OVERSIGHT_COMMITTEE-00029230; MAZARS-OVERSIGHT_COMMITTEE-00029237; MAZARS-OVERSIGHT_COMMITTEE-00029240; MAZARS-OVERSIGHT_COMMITTEE-00029241; MAZARS-OVERSIGHT_COMMITTEE-00029249; MAZARS-OVERSIGHT_COMMITTEE-00029255; MAZARS-OVERSIGHT_COMMITTEE-00029256; MAZARS-OVERSIGHT_COMMITTEE-00029345; MAZARS-OVERSIGHT_COMMITTEE-00029364; MAZARS-OVERSIGHT_COMMITTEE-00029429; MAZARS-OVERSIGHT_COMMITTEE-00029470; MAZARS-OVERSIGHT_COMMITTEE-00029752; MAZARS-OVERSIGHT_COMMITTEE-00029781; MAZARS-OVERSIGHT_COMMITTEE-00029793; MAZARS-OVERSIGHT_COMMITTEE-00029882; MAZARS-OVERSIGHT_COMMITTEE-00030068; MAZARS-OVERSIGHT_COMMITTEE-00030082; MAZARS-OVERSIGHT_COMMITTEE-00030202; MAZARS-OVERSIGHT_COMMITTEE-00030249; MAZARS-OVERSIGHT_COMMITTEE-00030260; MAZARS-OVERSIGHT_COMMITTEE-00030618; MAZARS-OVERSIGHT_COMMITTEE-00030619; MAZARS-OVERSIGHT_COMMITTEE-00030751; MAZARS-OVERSIGHT_COMMITTEE-00030752 (on file with the Committee).

³⁶ MAZARS-OVERSIGHT_COMMITTEE-00018278; MAZARS-OVERSIGHT_COMMITTEE-00018288; MAZARS-OVERSIGHT_COMMITTEE-00018309; MAZARS-OVERSIGHT_COMMITTEE-00018318; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018337; MAZARS-OVERSIGHT_COMMITTEE-00018669; MAZARS-OVERSIGHT_COMMITTEE-00018771; MAZARS-OVERSIGHT_COMMITTEE-00018920; MAZARS-OVERSIGHT_COMMITTEE-00018930; MAZARS-OVERSIGHT_COMMITTEE-00028729; MAZARS-OVERSIGHT_COMMITTEE-00028734; MAZARS-OVERSIGHT_COMMITTEE-00028739; MAZARS-OVERSIGHT_COMMITTEE-00028759; MAZARS-OVERSIGHT_COMMITTEE-00028768; MAZARS-OVERSIGHT_COMMITTEE-00028806; MAZARS-OVERSIGHT_COMMITTEE-00028811; MAZARS-OVERSIGHT_COMMITTEE-00028998; MAZARS-OVERSIGHT_COMMITTEE-00028999; MAZARS-OVERSIGHT_COMMITTEE-00029006; MAZARS-OVERSIGHT_COMMITTEE-00029011; MAZARS-OVERSIGHT_COMMITTEE-00029012; MAZARS-OVERSIGHT_COMMITTEE-00029155; MAZARS-OVERSIGHT_COMMITTEE-00029186; MAZARS-OVERSIGHT_COMMITTEE-00029195; MAZARS-OVERSIGHT_COMMITTEE-00029202; MAZARS-OVERSIGHT_COMMITTEE-00029218; MAZARS-OVERSIGHT_COMMITTEE-00029229; MAZARS-OVERSIGHT_COMMITTEE-00029240; MAZARS-OVERSIGHT_COMMITTEE-00029237; MAZARS-OVERSIGHT_COMMITTEE-00029435 (on file with the Committee). The records produced to the Committee by Mazars appear to show that at least \$4,275 of the total amount expended by the Secret Service on rooms that had been charged at rates above per diem was refunded to the agency; available records do not explain why these amounts were refunded. MAZARS-OVERSIGHT_COMMITTEE-00028811; MAZARS-OVERSIGHT_COMMITTEE-00029011; MAZARS-OVERSIGHT_COMMITTEE-00029237 (on file with the Committee).

President Trump had already charged taxpayers \$2.5 million largely “triggered by Trump’s travel, or the travel of his family and aides.”³⁷

In total, the limited room records produced to the Committee by Mazars for the Trump International Hotel in Washington, D.C., document just over \$70,000 in spending by the agency there during 11 months from September 2017 to August 2018 for which the Committee has room records from Mazars.³⁸ Although it is clear that the 11 months of guest logs provided to the Committee for just one of President Trump’s hotels reflect only a tiny sliver of the Secret Service’s expenditures at Trump-owned properties, the details of these expenditures demonstrate unambiguously how former President Trump used the federal government to direct payments—*at rates his business set*—from the American taxpayer to his pockets in violation of the Constitution’s Domestic Emoluments Clause, gouging the Secret Service while he charged other patrons far less. This was a business practice designed to fleece taxpayers.

After Promising They Would Allow the President’s Entourage to Stay for Free, the Trump International Hotel in Washington, D.C., Not Only Charged the Secret Service but Charged It Exorbitant Rates When It Was Protecting Trump Family Members at the Hotel

Between September 2017 and August 2018, several of former President Trump’s children and their families stayed at Trump’s D.C. hotel, inducing Secret Service expenditures at the property during that time frame.³⁹

After claiming in 2019 that former President Trump’s government entourage stayed at Trump properties “for free,” Eric Trump answered a question in 2020 about the rates Trump properties charged the Secret Service for stays by saying: “We provide the rooms at cost and

³⁷ *Trump’s Company Billed the Government at Least \$2.5 Million. Here Are the Key Charges.*, Washington Post (Oct. 27, 2020) (online at www.washingtonpost.com/politics/key-charges-trump-properties/2020/10/27/bfa39b08-16cd-11eb-82db-60b15c874105_story.html).

³⁸ The \$70,735 in Secret Service expenditures presented in this report is net of what appear to be \$6,431 in charges refunded to the Secret Service by the Trump International Hotel in Washington, D.C., during the period covered by the room records provided to the Committee by Mazars. MAZARS-OVERSIGHT_COMMITTEE-00028811; MAZARS-OVERSIGHT_COMMITTEE-00029011; MAZARS-OVERSIGHT_COMMITTEE-00029237 (on file with the Committee). Mazars did not produce to the Committee records that clearly identify any charges other than room charges—such as meals or incidentals—that may have been incurred by the Secret Service during stays at the Trump International Hotel in Washington, D.C.

³⁹ U.S. Secret Service, Requests for GSA Lodging Variance (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>); During the September 2017 to August 2018 time period, the Secret Service does not appear from the limited records available to the Committee to have been renting rooms at the Trump International Hotel in Washington, D.C., to protect former President Trump himself. In fact, the term “POTUS” [President of the United States] appears in the hotel records provided to the Committee by Mazars on only two days—on the nights of October 30 and October 31, 2017, when it is listed as the guest name for two rooms each evening—but no Secret Service room charges appear for either night in that month’s room records. MAZARS-OVERSIGHT_COMMITTEE-00018699; MAZARS-OVERSIGHT_COMMITTEE-00018703. Notably, there is a rate of \$350 shown for each of the four rooms for which “POTUS” is shown as the guest name; it is unclear if former President Trump paid for these rooms—and whether he used taxpayer funds to do so.

could make far more money renting them to members or guests.”⁴⁰ Both of Eric Trump’s assertions are directly contradicted by the Secret Service charges associated with his own stays at former President Trump’s D.C. hotel.

Of the 41 variance request waivers provided to the Committee by the Secret Service covering dates during the Trump presidency and parts or all of several months after former President Trump left office, 17 were for stays at a Trump property by Eric Trump or Lara Trump—individually, with each other, or with other members of former President Trump’s family.⁴¹ In fact, the Secret Service charges associated with Eric Trump’s stays at just the Trump International Hotel in Washington, D.C., demonstrate clearly that former President Trump’s D.C. hotel treated stays by Trump family members as the ultimate government ATM withdrawal opportunity. In many cases, the hotel charged the Secret Service rates for rooms to protect them that were many times above the per diem rates—and also frequently charged the agency more than the rates being charged to other patrons on the same nights.⁴²

The limited waivers provided to the Committee by the Secret Service show that the agency sought approval to pay rates above the government per diem for three stays by Eric Trump between September 2017 and August 2018 at former President Trump’s D.C. hotel (the time period covered by the Mazars room records discussed in this report).⁴³ For example, in conjunction with an apparent stay by Eric Trump and his wife, Lara Trump, on November 28, 2017, the Secret Service approved a waiver to pay a room rate of \$600 when the per diem for that month was \$201—a 300% markup.⁴⁴ The room records produced to the Committee by Mazars show that, on that night, among the rooms the Secret Service rented, several were charged at the \$600 rate.⁴⁵ Notably, that very night, the Trump International Hotel in Washington, D.C., rented out more than 80 rooms at rates less than \$600 per room, including a dozen rooms rented to the Inner Mongolia Yitai Coal Co., Ltd.—which is headquartered in China—for \$338.85 each.⁴⁶ In addition, the room records show that the Inner Mongolia Yitai

⁴⁰ *G-7 at Trump Golf Resort Saves the US Money: Eric Trump*, Yahoo!Finance (Oct. 17, 2019) (online at <https://finance.yahoo.com/news/g-7-at-trump-golf-resort-saves-the-us-money-eric-trump-192655739.html>); *Secret Service Has Paid Rates as High as \$650 a Night for Rooms at Trump’s Properties*, Washington Post (Feb. 7, 2020) (online at www.washingtonpost.com/politics/secret-service-has-paid-rates-as-high-as-650-a-night-for-rooms-at-trumps-properties/2020/02/06/7f27a7c6-3ec5-11ea-8872-5df698785a4e_story.html).

⁴¹ U.S. Secret Service, Requests for GSA Lodging Variances (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁴² *Id.*

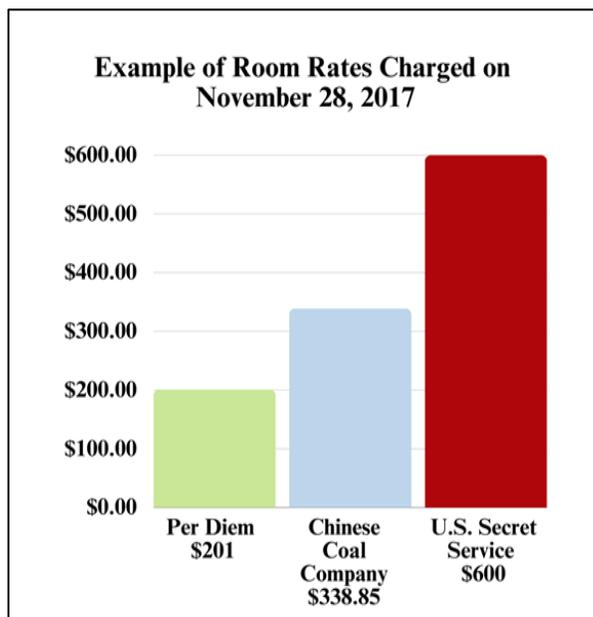
⁴³ *Id.*

⁴⁴ Email from [redacted] (CFO) to [redacted] WFO, RE: Request for GSA Lodging Variance – Visit of [redacted] to Washington, DC (Nov. 27, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁴⁵ MAZARS-OVERSIGHT_COMMITTEE-00018920.

⁴⁶ MAZARS-OVERSIGHT_COMMITTEE-00018916; MAZARS-OVERSIGHT_COMMITTEE-00018917; MAZARS-OVERSIGHT_COMMITTEE-00018918; MAZARS-OVERSIGHT_COMMITTEE-00018919; MAZARS-OVERSIGHT_COMMITTEE-00018920; MAZARS-OVERSIGHT_COMMITTEE-00018921; *Inner Mongolia Yitai Coal*, Forbes (online at www.forbes.com/companies/inner-mongolia-yitai-coal/)

Coal Co., Ltd. rented two rooms at \$958.19 each.⁴⁷ Examples of room rates charged by former President Trump’s D.C. hotel on November 28, 2017, are provided in the graph below.



When Eric Trump visited the Trump International Hotel in Washington, D.C., on February 22, 2018, the rates the hotel charged the Secret Service for some rooms were raised above even the rates it had charged during Eric and Lara Trump’s November 2017 stay. On the night of February 22, the Secret Service approved a variance request waiver for a rate of \$895—an astounding markup of more than 450% of the per diem rate.⁴⁸ The room records provided by Mazars show that, among the rooms the Secret Service rented, two rooms were charged at \$895 each.⁴⁹ The room records also show that former President Trump’s D.C. hotel rented out more than 100 rooms that evening at rates of less than \$895—including at least one room rented out for just \$150.⁵⁰

Amazingly, it appears that on some nights for some rooms, Donald Trump’s D.C. hotel was charging a federal agency—funded entirely by U.S. taxpayer money—more than he was charging some members of a foreign royal family. For example, on that same night, February 22, 2018, four of the rooms charged to the “Sheikh Al Thani Family Extended Stay”—Al Thani being the name of the royal family of Qatar—were charged at rates less than \$895

(accessed Aug. 22, 2024); See also *Inner Mongolia Yitai Coal Co Ltd*, Reuters (www.reuters.com/markets/companies/900948.ss) (accessed Sept. 15, 2024).

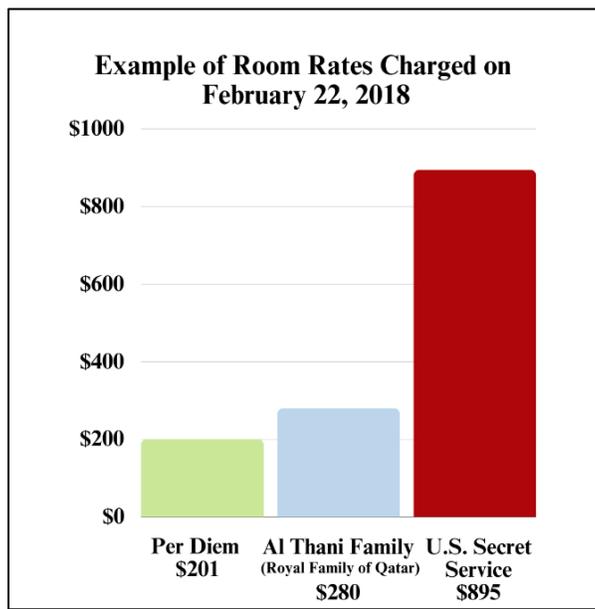
⁴⁷ MAZARS-OVERSIGHT_COMMITTEE-00018920.

⁴⁸ Email from [redacted] CFO to [redacted] WFO, Re: Request for GSA Lodging Variance – Visit of [redacted] to Washington, DC (Feb. 21, 2018) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁴⁹ MAZARS-OVERSIGHT_COMMITTEE-00029155.

⁵⁰ MAZARS-OVERSIGHT_COMMITTEE-00029143—MAZARS-OVERSIGHT_COMMITTEE-00029155.

(three were charged at \$280, and one was charged at \$490).⁵¹ The room records also show that the Al Thanis rented three additional rooms at the rates of \$3,500, \$2,310, and \$1,500.⁵² In other words, in some instances, President Trump was fleecing the U.S. government for more money in constitutionally prohibited *domestic* emoluments than he was shaking down from foreign states and monarchs for constitutionally prohibited foreign emoluments. An example of room rates charged by former President Trump’s D.C. hotel on February 22, 2018, is provided below.



Eric Trump apparently returned to the D.C. hotel again on February 27, 2018, and for that night, the Secret Service approved a variance request waiver for a room rate of \$595 when the

⁵¹ As discussed in the staff report on foreign emoluments recorded in the documents provided to the Committee by Mazars, an extended stay occurred at the Trump International Hotel in Washington, D.C., from January through March 2018 that frequently encompassed multiple rooms booked under the names of the “Sheikh Al Thani family” or “Khalid Al Thani.” The previous staff report on foreign emoluments did not count the charges incurred by the Al Thani family as emoluments following an assertion by the then-Qatari Ambassador to the United States in a 2022 letter to former Chairwoman Maloney that “no representative of the Embassy of Qatar, and no other government official of the State of Qatar, was a guest at the Trump International Hotel”—although the Qatari Ambassador did not identify who stayed at the hotel under the name of Al Thani or whether they were members of the Qatari royal family. Letter from Meshal Al-Thani, Ambassador of the State of Qatar, to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Nov. 22, 2022) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Embassy%20of%20the%20State%20of%20Qatar.221122.NARA%20Letter%20re%20Trump%20OPO.pdf>); Congressional Research Service, *Qatar: Governance, Security, and U.S. Policy* (Apr. 11, 2022) (R44533) (online at <https://crsreports.congress.gov/product/pdf/R/R44533>); Committee on Oversight and Accountability, Democrats, *Press Release: Oversight Democrats Release Report Proving Trump Pocketed Millions from at Least 20 Foreign Governments as President* (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/news/press-releases/oversight-democrats-release-report-proving-trump-pocketed-millions-from-at-least>); Minority Staff, Committee on Oversight and Accountability, *White House for Sale: How Princes, Prime Ministers, and Premiers Paid Off President Trump* (hereinafter “Foreign Emoluments Report”) (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2024-01-04.COA%20DEMS%20-%20Mazars%20Report.pdf>).

⁵² MAZARS-OVERSIGHT_COMMITTEE-00029155.

per diem was still \$201.⁵³ Again on that evening, at least two of the rooms charged to the continuing “Sheikh Al Thani Family Extended Stay” were charged at rates of less than \$595.⁵⁴

The Secret Service produced to the Committee a variance waiver request for May 15–16, 2017, covering yet another stay by Eric and Laura Trump.⁵⁵ The agency also produced a variance request waiver for a contemporaneous stay on May 15–17, 2017, by a protectee whose name is redacted.⁵⁶ The per diem on those evenings was \$242.⁵⁷ The waiver documents indicate that the Secret Service requested and received authority to be charged \$854 for at least one of the rooms it planned to use to protect Eric and Lara Trump, but the highest rate charged to the Secret Service for the rooms it used to protect the unknown protectee at the same time was just \$342.⁵⁸

The Trump International Hotel in Washington, D.C. also commonly assessed the Secret Service outrageous rates for rooms used to protect other Trump family members. For example, a variance request waiver provided to the Committee by the Secret Service shows that on November 8, 2017, when Donald Trump, Jr. stayed at former President Trump’s D.C. hotel, the Secret Service approved a room rate of \$1,185—more than five times the per diem rate of \$201.⁵⁹ The room records provided to the Committee by Mazars show that, among the rooms the Secret Service rented that day, two were charged at the rate of \$1,185 (each).⁶⁰ But, on that same evening, the Trump International Hotel in Washington, D.C., rented out more than 100 rooms at just \$125 each.⁶¹ It also charged more than 100 additional rooms to the “LOC Software R2CON” conference at just \$170 each.⁶² The LOC Software R2CON was a conference for a

⁵³ Email from [redacted] CFO to [redacted] WFO, RE: Request for GSA Lodging Variance – Visit of [redacted] to Washington, D.C. (Feb. 26, 2018) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁵⁴ MAZARS-OVERSIGHT_COMMITTEE-00029195.

⁵⁵ Email from [redacted] (CFO) to [redacted] WFO; logrc, RE: Request for GSA Lodging Variance- [redacted], (May 9, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁵⁶ Email from [redacted] (CFO) to [redacted] (WFO); logrc (May 1, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁵⁷ *Id.*

⁵⁸ Email from [redacted] (CFO) to [redacted] WFO; logrc, RE: Request for GSA Lodging Variance- [redacted], (May 9, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>); Email from [redacted] (CFO) to [redacted] (WFO); logrc (May 1, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

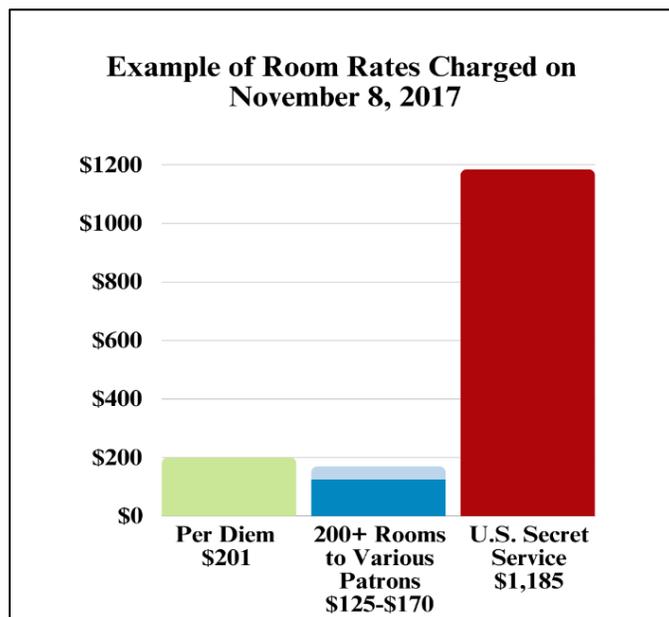
⁵⁹ Email from [redacted] (CFO) to [redacted] (WFO); logrc; RE: Request for GSA Lodging Variance – [redacted] (Nov. 8, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁶⁰ MAZARS-OVERSIGHT_COMMITTEE-00018771.

⁶¹ MAZARS-OVERSIGHT_COMMITTEE-00018760—MAZARS-OVERSIGHT_COMMITTEE-00018778.

⁶² *Id.*

“retail technology” software company.⁶³ An example of room rates charged by former President Trump’s D.C. hotel on November 8, 2017, is provided below.



Interestingly, the records provided by Mazars do not record any charges attributed to private individuals Eric Trump, Lara Trump, and Donald Trump Jr. By contrast, public officials Ivanka Trump and Jared Kushner—Donald Trump’s daughter and son-in-law *and* White House advisers in his Administration—were recorded as having been charged a total of \$6,158.42 for their stays revealed in the records provided to the Committee by Mazars.⁶⁴ The Committee has been unable to obtain any explanation for this glaring discrepancy. It is theoretically possible that the Secret Service repeatedly rented—and paid for—rooms in anticipation of stays by Eric Trump, Lara Trump, and Donald Trump Jr. that were ultimately canceled. But it is far more likely that Ivanka Trump and Jared Kushner were charged because, as officials in the Trump Administration, their expenses were going to be paid for by U.S. taxpayers. In other words, Donald Trump’s adult children apparently stayed for free at Mr. Trump’s hotel unless they were on the government payroll, in which case taxpayers may have been on the hook for their exorbitant room charges.

⁶³ R²CON 2017 (Nov. 8–10, 2017) (online at <https://locsoftware.com/R2CON/>).

⁶⁴ MAZARS-OVERSIGHT_COMMITTEE-00021355; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018329; MAZARS-OVERSIGHT_COMMITTEE-00018361; MAZARS-OVERSIGHT_COMMITTEE-00018368; MAZARS-OVERSIGHT_COMMITTEE-00018373; MAZARS-OVERSIGHT_COMMITTEE-00018659; MAZARS-OVERSIGHT_COMMITTEE-00018898; MAZARS-OVERSIGHT_COMMITTEE-00018930; MAZARS-OVERSIGHT_COMMITTEE-00018938; MAZARS-OVERSIGHT_COMMITTEE-00019191; MAZARS-OVERSIGHT_COMMITTEE-00019277; MAZARS-OVERSIGHT_COMMITTEE-00019289; MAZARS-OVERSIGHT_COMMITTEE-00019346; MAZARS-OVERSIGHT_COMMITTEE-00016767. The examples considered in this report include Ivanka Trump and Jared Kushner—daughter and son-in-law to former President Trump, respectively, who also served as Advisors to him during his presidency. Their expenditures at former President Trump’s D.C. hotel appear in their joint names, and they are therefore counted in this report as a single example.

Compound Emoluments Violations: The Trump International Hotel in Washington, D.C., Charged Members of the Secret Service Exorbitant Rates When They Were Protecting Foreign Heads of State Staying at the Trump Hotel Who Were Themselves Paying Then-President Trump Unlawful Foreign Emoluments

Another significant catalyst for expenditures by the Secret Service at former President Trump's D.C. hotel was visits by foreign leaders—leaders who were also making payments to the former President through his business in violation of the U.S. Constitution's *Foreign Emoluments Clause*. In September 2017, for example, former President Trump's D.C. hotel received a combined total of more than \$266,000 from a foreign government (in violation of the U.S. Constitution's Foreign Emoluments Clause), the Secret Service (in violation of the U.S. Constitution's Domestic Emoluments Clause), and an individual who was illegally lobbying on behalf of foreign interests involving the foreign government also staying at former President Trump's D.C. hotel and to whom former President Trump would later grant a pardon. This month, in fact, was a notable foreign *and* domestic emoluments bonanza for Donald Trump's business.

In September 2017, then-President Trump met with the then-Prime Minister of Malaysia, Najib Razak, at the White House.⁶⁵ At the time, the Department of Justice (DOJ) was seeking to recover more than \$1 billion in assets that had been stolen from a Malaysian government investment fund co-founded and managed by Mr. Razak, in one of the largest global corruption scandals ever.⁶⁶ The Prime Minister and the numerous Malaysian officials accompanying him stayed at the Trump International Hotel in Washington, D.C., during the official visit. Their room charges and amenities—and a subsequent visit by Malaysian officials that month—totaled an eye-popping \$248,962 for the month of September 2017.⁶⁷

In that same month of September 2017, the Secret Service was charged \$12,578 at the Trump International Hotel in Washington, D.C., for rooms the agency rented on seven separate days: September 5, 6, 7, 10, 11, 12, and 13.⁶⁸ According to the documents provided to the Committee by Mazars, many of the rooms the Secret Service rented were charged at rates above the government per diem rate. It is unclear precisely how many of these rooms were related to

⁶⁵ *Trump Welcomes Najib Razak, the Malaysian Leader, as President, and Owner of a Fine Hotel*, New York Times (Sept. 12, 2017) (online at www.nytimes.com/2017/09/12/world/asia/trump-najib-razak-malaysia-white-house.html); see also Minority Staff, Committee on Oversight and Accountability, *White House for Sale: How Princes, Prime Ministers, and Premiers Paid Off President Trump* (Jan. 4, 2024) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2024-01-04.COA%20DEMS%20-%20Mazars%20Report.pdf>).

⁶⁶ *Malaysian Leader, Under Corruption Cloud, Will Meet with Trump*, New York Times (Sept. 9, 2017) (online at www.nytimes.com/2017/09/09/world/asia/malaysia-najib-razak-1mdb.html).

⁶⁷ MAZARS-OVERSIGHT_COMMITTEE-00008052 to MAZARS-OVERSIGHT_COMMITTEE-00008094; MAZARS-OVERSIGHT_COMMITTEE-00018425.

⁶⁸ MAZARS-OVERSIGHT_COMMITTEE-00018271; MAZARS-OVERSIGHT_COMMITTEE-00018278; MAZARS-OVERSIGHT_COMMITTEE-00018279; MAZARS-OVERSIGHT_COMMITTEE-00018288; MAZARS-OVERSIGHT_COMMITTEE-00018309; MAZARS-OVERSIGHT_COMMITTEE-00018318; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018337 (on file with the Committee).

the stay by the Malaysian Prime Minister and his delegation—which began incurring charges on September 8, 2017, and continued incurring charges through at least September 15, 2017.⁶⁹

According to the records provided to the Committee by Mazars, across September 6, 7, and 10, several of the rooms rented by the Secret Service were billed above the \$231 per diem—three at \$640 and two at \$650.⁷⁰ From September 11 through September 13, 2017, half of all the rooms the agency rented were billed at \$650 each—nearly triple the approved government per diem rate.⁷¹

The Secret Service provided waivers approving above-per diem spending for only some of the agency’s expenditures in September 2017. A document related to the stay of a redacted “Protectee” who “requested to be located at the Trump International Hotel (RON) throughout the duration of the visit” approved the rental of a redacted number of rooms at the cost of \$650 per night from “9/11/17–9/13/17”—a rate that was \$419 above the per diem rate.⁷² Notably, it was publicly reported that on September 12, 2017, “[b]efore arriving at the White House [...] to meet with President Trump, Malaysian Prime Minister Najib Razak strode through the golden doors of an elevator at the Trump International Hotel and past the lounge to his waiting motorcade.”⁷³ However, no similar approvals or requests appear to exist for the Secret Service’s expenditures on September 6, 7, and 10. Stated differently, the Secret Service cannot explain why on these three dates in September 2017, it acceded to demands from former President Trump’s D.C. hotel to hand over taxpayer funds to pay for hotel rooms at rates—set by the hotel—that were far in excess of authorized government rates apparently without ever obtaining approval for these expenditures. There was thus not even administrative approval for this rip-off, which constitutionally, can never be made legitimate.

In addition to the Malaysian government officials, Elliott Broidy, a former top fundraiser for Mr. Trump who was lobbying the Trump Administration on behalf of Malaysian interests as an unregistered foreign agent, also stayed at the Trump International Hotel in Washington, D.C., during September 2017. In total, Mr. Broidy was charged \$5,345 for rooms at the hotel that month.⁷⁴ In October 2020, Elliott Broidy pled guilty to acting as an unregistered foreign agent

⁶⁹ MAZARS-OVERSIGHT_COMMITTEE-00008052—MAZARS-OVERSIGHT_COMMITTEE-00008094.

⁷⁰ MAZARS-OVERSIGHT_COMMITTEE-00018271; MAZARS-OVERSIGHT_COMMITTEE-00018278; MAZARS-OVERSIGHT_COMMITTEE-00018279; MAZARS-OVERSIGHT_COMMITTEE-00018288 (on file with the Committee).

⁷¹ MAZARS-OVERSIGHT_COMMITTEE-00018318; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018337 (on file with the Committee).

⁷² U.S. Secret Service, *Request for GSA Lodging Variance* (Sept. 6, 2017) (online at <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/Requests%20for%20GSA%20Lodging%20Variance.pdf>).

⁷³ *From Trump Hotel Lobby to White House, Malaysian Prime Minister Gets VIP Treatment*, Washington Post (Sept. 12, 2017) (online at www.washingtonpost.com/politics/from-trump-hotel-lobby-to-white-house-malaysian-prime-minister-gets-vip-treatment/2017/09/12/1b296f54-97d1-11e7-87fc-c3f7ee4035c9_story.html).

⁷⁴ *Elliott Broidy Pleads Guilty in Foreign Lobbying Case*, New York Times (Oct. 20, 2020) (online at www.nytimes.com/2020/10/20/us/politics/elliott-broidy-foreign-lobbying.html); U.S. Department of Justice, *Press Release: Elliott Broidy Pleads Guilty for Back-Channel Lobbying Campaign to Drop IMDB Investigation and Remove a Chinese Foreign National* (Oct. 20, 2020) (online at www.justice.gov/opa/pr/elliott-broidy-pleads-guilty-

for Malaysian interests and lobbying the U.S. government “to deport a critic of the Chinese Communist Party.”⁷⁵ Naturally, President Trump pardoned Mr. Broidy for these offenses shortly before leaving office.⁷⁶

back-channel-lobbying-campaign-drop-1mdb-investigation-and); MAZARS-OVERSIGHT_COMMITTEE-00018267; MAZARS-OVERSIGHT_COMMITTEE-00018270; MAZARS-OVERSIGHT_COMMITTEE-00018305; MAZARS-OVERSIGHT_COMMITTEE-00018314; MAZARS-OVERSIGHT_COMMITTEE-00018323; MAZARS-OVERSIGHT_COMMITTEE-00018332; MAZARS-OVERSIGHT_COMMITTEE-00018356; MAZARS-OVERSIGHT_COMMITTEE-00018360; MAZARS-OVERSIGHT_COMMITTEE-00018366; MAZARS-OVERSIGHT_COMMITTEE-00018422; MAZARS-OVERSIGHT_COMMITTEE-00018430.

⁷⁵ *Elliott Broidy Pleads Guilty in Foreign Lobbying Case*, New York Times (Oct. 20, 2020) (online at www.nytimes.com/2020/10/20/us/politics/elliott-broidy-foreign-lobbying.html); U.S. Department of Justice, *Press Release: Elliott Broidy Pleads Guilty for Back-Channel Lobbying Campaign to Drop 1MDB Investigation and Remove a Chinese Foreign National* (Oct. 20, 2020) (online at www.justice.gov/opa/pr/elliott-broidy-pleads-guilty-back-channel-lobbying-campaign-drop-1mdb-investigation-and).

⁷⁶ *With Hours Left in Office, Trump Grants Clemency to Bannon and Other Allies*, New York Times (May 5, 2021) (online at www.nytimes.com/2021/01/20/us/politics/trump-pardons.html).

PART II: 30 EXAMPLES OF FEDERAL AND STATE OFFICIALS, FEDERAL JOB-SEEKERS, AND PRESIDENTIAL PARDON-SEEKERS WHO LINED DONALD TRUMP'S POCKETS

The 11 months of guest logs for former President Trump's D.C. hotel reveal dozens of examples of state and federal officials, as well as individuals who sought—and, in many cases, obtained—nominations or appointments to prominent federal executive branch positions by then-President Trump or Trump presidential pardons following criminal convictions, who all stayed at the hotel. This report highlights just 30 examples from among those in the D.C. hotel's room records who, together, put nearly a quarter of a million dollars into former President Trump's pockets through his D.C. hotel. More than half of these stays involved current federal or state officials and therefore directly violated the Constitution's Domestic Emoluments Clause, to the extent any taxpayer funds were used to pay for them. All of them raise the specter of corrupt and pay-to-play transactions.

Payments by Federal and State Officials That Implicate the Domestic Emoluments Clause

Of the 30 examples of individuals who paid money to former President Trump's D.C. hotel profiled in this report, 16 made some or all of their expenditures at the hotel while they were federal or state officials, including:

- Eight ambassadors;
- Three individuals who were appointed by President Trump to be federal judges;
- Two state governors;
- One delegation from a state legislature; and
- Two other executive branch officials, including a cabinet secretary.

From the limited records available to the Committee from Mazars covering just 11 months between September 2017 and August 2018, Democratic staff have identified payments totaling \$163,094.23 made by these 16 individuals to former President Trump's D.C. hotel.

As discussed, because the records produced to the Committee by Mazars do not specify the sources of funds used to make payments to former President Trump's hotel, it is not possible to establish definitively whether these officials' payments involved taxpayer funds.

However, of the total sum that these individuals paid to Trump's hotel, \$103,663.23 was paid while they were serving as federal or state officials and thus potentially implicate the Domestic Emoluments Clause. To the extent any of these payments were made using state or federal taxpayer funds, they would violate the clause.⁷⁷ These expenditures are discussed in more detail below.

⁷⁷ Of note, the expenditures for rooms at former President Trump's D.C. hotel made by the federal officials profiled in this report frequently exceeded authorized federal per diem rates. However, in the absence of records documenting whether any portions of these expenditures were made using federal funds, this report counts the entire

Ambassadors

Like many presidents before him, Donald Trump rewarded some of his largest donors—including many who lacked any diplomatic experience—with ambassadorships, but he did so at a rate unmatched by previous presidential administrations. As *Politico* reported, “Donald Trump named more of his political allies to serve as ambassadors than any president in modern history.”⁷⁸ Notably, rather than facilitating strong relations with their host nations as ambassadors are expected to do, many of the individuals former President Trump chose for ambassadorial posts failed to adhere to standard diplomatic customs, causing needless tensions with host nations. In 2020, *NPR* observed that “[c]ontroversies [h]ave [f]ollowed” former President Trump’s ambassadorial selections, and several of his choices—including individuals who were big spenders at his D.C. hotel—offended their host countries with their extreme politics or their cavalier disregard for diplomatic norms.⁷⁹

Eight of President Trump’s Ambassadors stayed at his D.C. hotel during their time in office, often while on official business, meaning any payments they made using taxpayer funds directly violated the constitutional prohibition on domestic emoluments. Many of these individuals also stayed at Donald Trump’s D.C. hotel before they were appointed as ambassadors. Revealingly, many of their stays *prior to their appointments* coincided with milestones in their nominations processes, including their appearances at hearings convened by Senate committees to consider their nominations.

- **Kelly Knight Craft, U.S. Ambassador to Canada (2017–2019) and U.S. Ambassador to the United Nations (2019–2021):**⁸⁰ Kelly Knight Craft, who had been a Trump megadonor before the President rewarded her with what would ultimately be two plush ambassadorial posts, was such a loyal, high-dollar customer at the Trump hotel, that she “had gold status” there.⁸¹ Ms. Craft was a hotel regular during the 11 months covered by the Mazars records—a period that coincided with her service as President Trump’s Ambassador to Canada and preceded her promotion to United Nations (UN) Ambassador in 2019. While serving as Ambassador to Canada, she booked rooms on at least 20 nights

amounts expended by federal officials in the total of expenditures potentially implicating the Domestic Emoluments Clause.

⁷⁸ *Biden Under Pressure to Tap Fewer Political Ambassadors Than Trump, Obama*, *Politico* (Mar. 15, 2021) (online at www.politico.com/news/2021/03/15/biden-political-ambassadors-476050).

⁷⁹ *Under Trump, More Big Donors Are Named Ambassadors—And Controversies Have Followed*, *NPR* (Aug. 18, 2020) (online at www.npr.org/2020/08/18/903199848/under-trump-more-big-donors-are-named-ambassadors-and-controversies-have-followe).

⁸⁰ U.S. Department of State, Office of the Historian, Kelly Knight Craft, (online at <https://history.state.gov/departmenthistory/people/craft-kelly-knight>) (accessed Aug. 20, 2024); Kelly Craft (@KellyCraftKY), X (Jan. 20, 2021) (online at <https://x.com/KellyCraftKY/status/1351902382746177544>).

⁸¹ *Meet Kelly Craft, the Billionaire Republican Donor Poised to Become Ambassador to Canada*, *Global News* (June 15, 2017) (online at <https://globalnews.ca/news/3530652/donald-trump-canada-ambassador-us-kelly-craft-knight/>); *Trump to Name Richard Grenell, U.S. Ambassador to Germany, as Acting Head of Intelligence*, *Washington Post* (Feb. 19, 2020) (online at www.washingtonpost.com/national-security/trump-to-name-richard-grenell-us-ambassador-to-germany-as-acting-head-of-intelligence/2020/02/19/640a0716-536c-11ea-929a-64efa7482a77_story.html).

at the Trump International Hotel in Washington, D.C., over the course of 12 separate stays, spending a total of nearly \$30,000.⁸² On one such stay in November 2017, she and her husband booked a \$10,000 room for just one night. Moreover, emails released by the State Department make clear that not only did Ms. Craft have a strong preference for staying at Donald Trump’s Hotel, even when options that were more conveniently located were available, but she actively “Steered U.S. Government Business to Her Boss’ Hotel.”⁸³

One of Ambassador Craft’s stays at former President Trump’s D.C. hotel occurred on the nights of June 19 to June 21, 2018, when she was in town on official business to attend the SelectUSA Conference, an annual economic development conference hosted by the U.S. Department of Commerce.⁸⁴ Although the summit, which went from June 20 through June 22, was held ten miles away at the Gaylord National Resort and Convention Center in National Harbor, Maryland, former Ambassador Craft chose to stay at the Trump International Hotel in downtown Washington, D.C.—a 24–50-minute drive away.⁸⁵ The room records for Donald Trump’s D.C. hotel produced to the Committee show that this stay was charged at \$1,395 per night.

Records released by the Department of State show that although her staff had offered her lodging options much closer to the conference venue than the Trump International Hotel in Washington, D.C., Ambassador Craft explicitly chose to stay at

⁸² MAZARS-OVERSIGHT_COMMITTEE-00018305; MAZARS-OVERSIGHT_COMMITTEE-00018314; MAZARS-OVERSIGHT_COMMITTEE-00018323; MAZARS-OVERSIGHT_COMMITTEE-00018467; MAZARS-OVERSIGHT_COMMITTEE-00018501; MAZARS-OVERSIGHT_COMMITTEE-00018648; MAZARS-OVERSIGHT_COMMITTEE-00018859; MAZARS-OVERSIGHT_COMMITTEE-00028928; MAZARS-OVERSIGHT_COMMITTEE-00019373; MAZARS-OVERSIGHT_COMMITTEE-00029737; MAZARS-OVERSIGHT_COMMITTEE-00029750; MAZARS-OVERSIGHT_COMMITTEE-00029759; MAZARS-OVERSIGHT_COMMITTEE-00029860; MAZARS-OVERSIGHT_COMMITTEE-00029878; MAZARS-OVERSIGHT_COMMITTEE-00029887; MAZARS-OVERSIGHT_COMMITTEE-00017484; MAZARS-OVERSIGHT_COMMITTEE-00030257; MAZARS-OVERSIGHT_COMMITTEE-00030268; MAZARS-OVERSIGHT_COMMITTEE-00030277.

⁸³ *Trump’s Ambassador Craft Steered U.S. Government Business to Her Boss’ Hotel*, Forbes (Sept. 2, 2021) (online at www.forbes.com/sites/zacheverson/2021/09/02/trumps-ambassador-craft-steered-us-government-business-to-her-boss-hotel/).

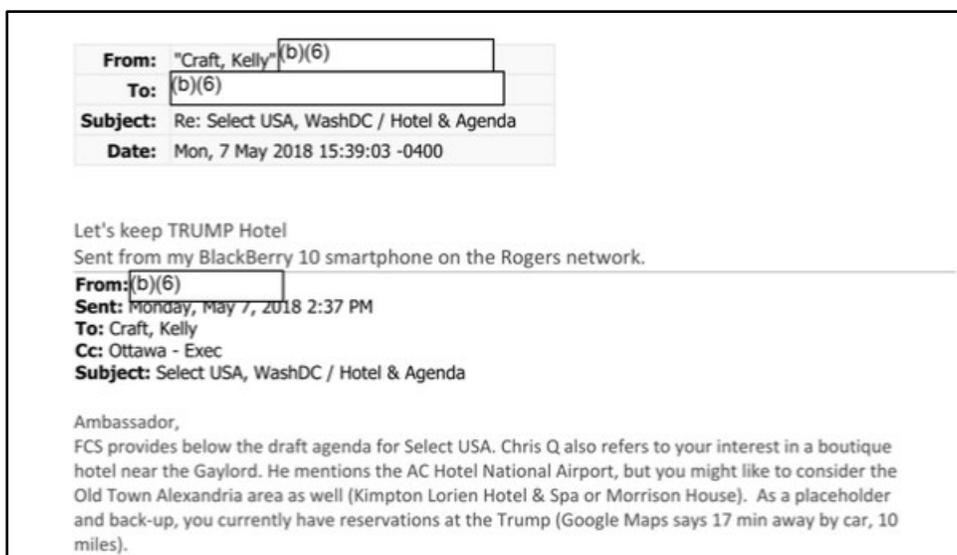
⁸⁴ U.S. Department of State, *Press Briefing with Gilbert Kaplan, Under Secretary of Commerce for International Trade, on the 2018 SelectUSA Investment Summit* (June 14, 2018) (online at <https://2017-2021.state.gov/the-2018-selectusa-investment-summit/>); Select USA Investment, *About the SelectUSA Investment Summit* (online at www.selectusasummit.us/About/About-the-Investment-Summit) (accessed Aug. 9, 2024).

⁸⁵ U.S. Embassy & Consulates in the United Kingdom, *Save the Date – SelectUSA Summit 2018* (online at <https://uk.usembassy.gov/save-date-selectusa-2018/>) (accessed Aug. 9, 2024). A search of Google Maps shows the distance between the Trump D.C. Hotel (present day Waldorf Astoria) to the Gaylord National Resort & Convention Center is 10.3 miles. Departing on June 20, 2018, at 3:30 pm, Google’s estimated time of travel was “typically 24–50 min.” (Google Maps, *Directions from Trump International Hotel, D.C. (present day Waldorf Astoria) to Gaylord National Resort & Convention Center* (online at www.google.com/maps/dir/Waldorf+Astoria+Washington+DC,+Pennsylvania+Avenue+Northwest,+Washington,+DC/Gaylord+National+Resort+%26+Convention+Center,+Waterfront+Street,+National+Harbor,+MD/@38.8374122,-77.0907545,12z/data=!3m1!4b1!4m1!7!4m1!6!1m5!1m1!1s0x89b7b79a1dfd66e9:0xd45a6a779f430162!2m2!1d-77.027582!2d38.894108!1m5!1m1!1s0x89b7b0730bf2c4b9:0xa0869d3ec47e8d52!2m2!1d-77.0158602!2d38.7807742!2m3!6e0!7e2!8j1529508600) (accessed Aug. 22, 2024)).

former President Trump’s hotel. According to an email exchange released by the State Department, an aide to then-Ambassador Craft who had been tasked with finding a “boutique hotel near the Gaylord” Convention Center suggested that the Ambassador consider two hotels in nearby Alexandria, Virginia, which were less than five miles away from the conference venue.⁸⁶ However, former Ambassador Craft insisted on staying at former President Trump’s D.C. hotel, telling her aide, “Let’s keep TRUMP hotel.” A screengrab of their exchange follows:⁸⁷

⁸⁶ *Trump-Appointed Ambassador Directed Government Business to His Hotel, Emails Show*, Washington Post (Sept. 3, 2021) (online at www.washingtonpost.com/politics/2021/09/02/trump-appointed-ambassador-directed-government-business-his-hotel-emails-show/); Email from redacted sender to Ms. Kelly Craft, U.S. Ambassador to Canada, at 26 (May 7, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean); Email from Ms. Kelly Craft, U.S. Ambassador to Canada to redacted recipient, at 26 (May 7, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean). A search of Google Maps shows the distance between the Kimpton Lorien Hotel, Alexandria (present day Archer Hotel) to the Gaylord National Resort & Convention Center is 4.6 miles. Departing on June 20, 2018, at 3:30 pm, Google’s estimated time of travel was “typically 12-22 min.” (Google Maps, *Directions from Kimpton Lorien Hotel, Alexandria (present day Archer Hotel) to Gaylord National Resort & Convention Center* (online at google.com/maps/dir/Archer+Hotel+Old+Town+Alexandria,+King+Street,+Alexandria,+VA/Gaylord+National+Resort+%26+Convention+Center,+Waterfront+Street,+National+Harbor,+MD/@38.7935789,-77.0562587,14z/data=!3m1!4b1!4m1!7!4m1!6!1m5!1m1!1s0x89b7b0ff8581c0cb:0xdecbf5ddf12c6f3d!2m2!1d-77.0566838!2d38.8062196!1m5!1m1!1s0x89b7b0730bf2c4b9:0xa0869d3ec47e8d52!2m2!1d-77.0158602!2d38.7807742!2m3!6e0!7e2!8j1529508600) (accessed Aug. 22, 2024)). A search of Google Maps shows the distance between the Morrison House Old Town, Alexandria Hotel to the Gaylord National Resort & Convention Center is 4.4 miles. Departing on June 20, 2018, at 3:30 pm, Google’s estimated time of travel was “typically 12-20 min.” (Google Maps, *Directions from Mission House Old Town, Alexandria Hotel to Gaylord National Resort & Convention Center* (online at www.google.com/maps/dir/Morrison+House+Old+Town+Alexandria,+Autograph+Collection,+South+Alfred+Street,+Alexandria,+VA/Gaylord+National+Resort+%26+Convention+Center,+Waterfront+Street,+National+Harbor,+MD/@38.7927608,-77.0768587,13z/data=!3m1!4b1!4m1!7!4m1!6!1m5!1m1!1s0x89b7b05621feb5b:0x658ebadb697909e2!2m2!1d-77.0490323!2d38.8046162!1m5!1m1!1s0x89b7b0730bf2c4b9:0xa0869d3ec47e8d52!2m2!1d-77.0158602!2d38.7807742!2m3!6e0!7e2!8j1529508600) (accessed Aug. 22, 2024)).

⁸⁷ *Trump-Appointed Ambassador Directed Government Business to His Hotel, Emails Show*, Washington Post (Sept. 3, 2021) (online at www.washingtonpost.com/politics/2021/09/02/trump-appointed-ambassador-directed-government-business-his-hotel-emails-show/); Email from Ms. Kelly Craft, U.S. Ambassador to Canada to redacted recipient, at 26 (May 7, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean).



Ambassador Craft was not the only U.S. Ambassador at the SelectUSA conference who opted to brave the ten-mile, 24–50 minute drive from downtown D.C. to have the opportunity to stay at the President’s hotel. She was joined by Ambassador to Switzerland and Liechtenstein Edward McMullen⁸⁸ and Ambassador to Germany Richard Grenell.⁸⁹ All three ambassadors paid rates far above the lodging per diem in effect for June 2018 in the Washington, D.C., area to stay at their boss’s hotel.⁹⁰ Given that the State Department would normally pay for the travel expenses and accommodations of ambassadors on official travel, these stays all potentially violated the Constitution’s prohibition on domestic emoluments.

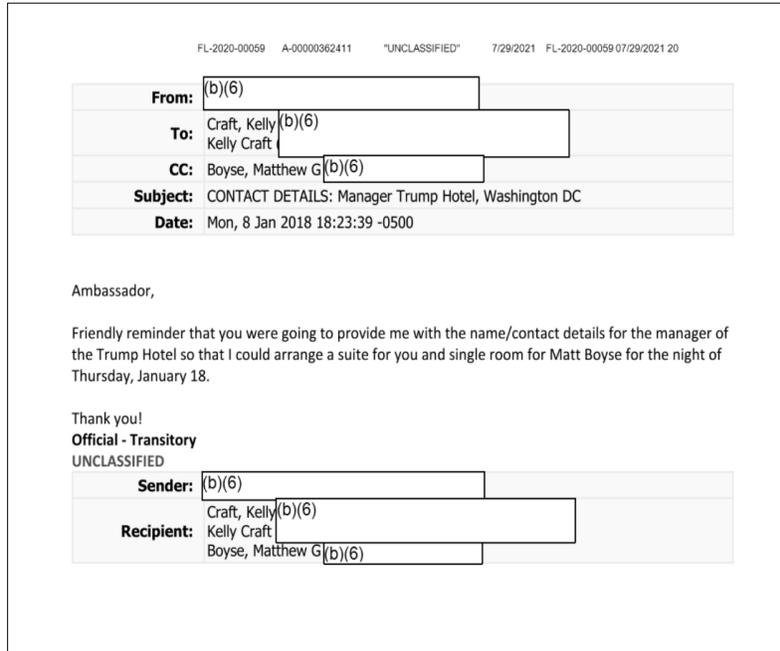
On another occasion, not only did Ambassador Craft stay at former President Trump’s D.C. hotel while she was in the capital, she also arranged for at least one of her subordinates to stay there too—albeit not in as luxurious of a room as she chose for herself. In January 2018, an aide to Ambassador Craft asked her for the contact information of the Trump Hotel’s manager—someone with whom Ms. Craft, as a VIP, gold-status guest, was presumably in frequent touch—so that the aide (a federal employee) could “arrange a suite for you and single room” for her Acting Deputy Chief

⁸⁸ U.S. Embassy in Switzerland and Liechtenstein, *Former Ambassador Edward T. McMullen, Jr.* (November 2017–January 2021) (online at <https://ch.usembassy.gov/our-relationship/policy-history/u-s-ambassadors-switzerland/former-ambassador-edward-mcmullen/>) (accessed Aug. 9, 2024); MAZARS-OVERSIGHT_COMMITTEE-00030245; MAZARS-OVERSIGHT_COMMITTEE-00030256; MAZARS-OVERSIGHT_COMMITTEE-00030267; MAZARS-OVERSIGHT_COMMITTEE-00030275; MAZARS-OVERSIGHT_COMMITTEE-00030282; MAZARS-OVERSIGHT_COMMITTEE-00030291.

⁸⁹ U.S. Department of State, Office of the Historian, *Richard A. Grenell* (online at <https://history.state.gov/departmenthistory/people/grenell-richard-a>) (accessed Aug. 12, 2024); MAZARS-OVERSIGHT_COMMITTEE-00030256; MAZARS-OVERSIGHT_COMMITTEE-00030267; MAZARS-OVERSIGHT_COMMITTEE-00030275.

⁹⁰ General Services Administration, FY 2018 Per Diem Rates—Effective October 1, 2017 (online at https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Forigin-www.gsa.gov%2Fsystem%2Ffiles%2FFY2018_PerDiemRatesMasterFile.xls&wdOrigin=BROWSELINK).

of Mission on the night of Thursday, January 18, 2018.⁹¹ Mazars records show that Ms. Craft paid \$1,195 for a room that night, while her deputy paid \$345—with both rooms easily blowing past the government per diem rate of \$201 at that time.⁹² A copy of the email exchange between former Ambassador Craft and her aide follows.⁹³



Ambassador Craft’s patronage of former President Trump’s D.C. hotel continued beyond the period covered by the room records provided by Mazars, including on at least one additional work trip, according to emails released by the State Department.⁹⁴ In November 2018, Ms. Craft’s staff gave her a list of five hotels in D.C. where room blocks

⁹¹ Email from a redacted sender to Ms. Kelly Craft, U.S. Ambassador to Canada, and Matt Boyse, Acting Deputy Chief of Mission and Minister-Counselor for Political Affairs in Ottawa, Canada, at 22 (Jan. 8, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean).

⁹² MAZARS-OVERSIGHT COMMITTEE-00028928; General Services Administration, FY 2018 Per Diem Rates—Effective October 1, 2017 (online at https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Forigin-www.gsa.gov%2Fsystem%2Ffiles%2FFY2018_PerDiemRatesMasterFile.xls&wdOrigin=BROWSELINK).

⁹³ Email from a redacted sender to Ms. Kelly Craft, U.S. Ambassador to Canada, and Matt Boyse, Acting Deputy Chief of Mission and Minister-Counselor for Political Affairs in Ottawa, Canada, at 22 (Jan. 8, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean); *Trump’s Ambassador Craft Steered U.S. Government Business to Her Boss’ Hotel*, Forbes (Sept. 2, 2021) (online at www.forbes.com/sites/zacheverson/2021/09/02/trumps-ambassador-craft-steered-us-government-business-to-her-boss-hotel).

⁹⁴ *Trump’s Ambassador Craft Steered U.S. Government Business to Her Boss’ Hotel*, Forbes (Sept. 2, 2021) (online at www.forbes.com/sites/zacheverson/2021/09/02/trumps-ambassador-craft-steered-us-government-business-to-her-boss-hotel/); Email from Karin B. Sullivan, Acting Executive Director of the Bureau of Western Hemisphere Affairs, U.S. Department of State, to WHA Chiefs of Mission, at 20–21 (Nov. 13, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean); Email from a redacted sender to Ms. Kelly Craft, U.S. Ambassador to Canada, at 19 (Dec. 1, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean).

had been “negotiated-within per diem rates,” ranging from \$119 to \$181 a night, for an upcoming conference.⁹⁵ Hotels are not required to offer federal per diem rates, but, for this event, even some luxury hotels, including the Ritz Carlton, opted to do so. The Trump International Hotel, on the other hand, did not.⁹⁶ This mattered little to Ambassador Craft, who, after confirming with her staff that this was an event she would indeed have to attend, insisted on staying at the Trump Hotel: “Is this a meeting I should attend? If so, I would prefer the TRUMP HOTEL.”⁹⁷

While Ambassador Craft clearly took great care to make sure she and her staff stayed at the “TRUMP HOTEL,” a July 2019 investigation by the Senate Foreign Relations Committee found that she may have lacked similar devotion to her official duties. The Senate Foreign Relations Committee found that while Ms. Craft was the U.S. Ambassador to Canada, she spent a total of seven months away from her post in Ottawa during her 20-month tenure—the equivalent of weekly roundtrips to the United States. Officials in Canada said that due to her frequent absences, Ms. Craft was derelict in her duties, with *Politico* reporting, “Canadian elected officials have told POLITICO that Craft kept a lower profile than previous ambassadors and often missed diplomatic events because of her extensive travel.”⁹⁸

Ms. Craft nonetheless enjoyed a promotion from President Trump to become the U.S. Ambassador to the UN. To celebrate her June 19, 2019, nomination hearing before the Senate Foreign Relations Committee for her UN Ambassador position, Ms. Craft hosted a luncheon—which was originally planned for the Hay Adams Hotel in Washington, D.C.⁹⁹ Unsurprisingly, Ambassador Craft ensured the location was changed to the Trump Hotel, where she ultimately toasted her promotion while putting yet more money into her boss’s pockets.¹⁰⁰ Given the Committee’s lack of records from this period, the Committee does not know how much Ms. Craft spent at former President

⁹⁵ *Id.*

⁹⁶ *Id.*; General Services Administration, *Per Diem Rates FAQ* (online at www.gsa.gov/travel/plan-a-trip/per-diem-rates/faqs) (accessed Oct. 12, 2024).

⁹⁷ Email from Ms. Kelly Craft, U.S. Ambassador to Canada, to redacted recipient, at 19 (Dec. 1, 2018) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean).

⁹⁸ United States Senate Committee on Foreign Relations, Minority Report, *On the Nomination of Kelly Craft to Be the U.S. Representative to the United Nations* (July 2019) (online at www.foreign.senate.gov/imo/media/doc/Minority%20Views%20--%20Craft%20FINAL.pdf); *Kelly Craft Was out of Canada for Half Her Days as Ambassador*, *Politico* (July 22, 2019) (online at www.politico.com/story/2019/07/22/kelly-craft-ambassador-canada-absence-1426702).

⁹⁹ *Trump’s Ambassador Craft Steered U.S. Government Business to Her Boss’ Hotel*, *Forbes* (Sept. 2, 2021) (online at www.forbes.com/sites/zacheverson/2021/09/02/trumps-ambassador-craft-steered-us-government-business-to-her-boss-hotel); Emails from Ellen Williams, Office Manager to Ambassador Craft, U.S. Embassy, Ottawa Canada, to Pam Saunders, Attache, Embassy of Canada, Washington, D.C. (June 17 & 18, 2019) (online at www.documentcloud.org/documents/21054164-state-19-0675-o-processed-clean); Pam Saunders, LinkedIn (online at www.linkedin.com/in/pam-saunders-b0685b63/) (accessed Aug. 9, 2024); U.S. Senate Foreign Relations Committee, Nomination Hearing (June 19, 2019) (online at www.foreign.senate.gov/hearings/nominations-061919).

¹⁰⁰ *Id.*

Trump’s hotel during her 2019 visits—which occurred while she was in government service.

- **Robert “Woody” Johnson IV, U.S. Ambassador to the United Kingdom (2017–2021):**¹⁰¹ Mr. Trump’s handpicked ambassador to the United Kingdom, Robert “Woody” Johnson IV, was also a customer at former President Trump’s D.C. hotel, who, like Ambassador Craft, had an apparent penchant for trying to steer customers to Mr. Trump’s businesses—one of many instances of unprofessional and inappropriate behavior that marred his tenure as ambassador.¹⁰²

Mr. Johnson got a head start in currying Mr. Trump’s favor by staying at Trump’s D.C. hotel during his inauguration. Although the Committee does not have room records from January 2017, Mr. Johnson, a vocal supporter of Mr. Trump—and a Trump Tower, New York resident—reportedly patronized President Trump’s D.C. hotel in the days around former President Trump’s inauguration.¹⁰³ Former President Trump announced on January 19, 2017—the day before his inauguration—that Mr. Johnson would be his pick to be U.S. Ambassador to the United Kingdom.¹⁰⁴

The hotel guest logs provided by Mazars show that Ambassador Johnson stayed at the D.C. hotel on six separate nights, spending more than \$5,500 over the 11-month

¹⁰¹ U.S. Department of State, Office of the Historian, *Robert Wood Johnson IV* (online at <https://history.state.gov/departmenthistory/people/johnson-robert-wood>) (accessed Sept. 6, 2024); U.S. Embassy & Consulates in the United Kingdom, *American Ambassadors to the United Kingdom* (online at <https://uk.usembassy.gov/our-relationship/rcambex/>) (accessed Aug. 6, 2024).

¹⁰² *Id.*; *The Controversial Billionaire Trump Ally with His Eyes on Chelsea: New York Jets Owner Woody Johnson, 74, Faced Racism and Sexism Claims When UK Ambassador, Lives in Trump Tower with His Actress Wife, 57, and Once Rode Across America with Michael Douglas*, Daily Mail (Mar. 16, 2022) (online at www.dailymail.co.uk/news/article-10619359/The-controversial-past-Woody-Johnson-tabled-2bn-bid-buy-Chelsea.html).

¹⁰³ *At Trump Hotel in Washington, Champagne Toasts in an Ethical ‘Minefield’*, New York Times (Jan. 19, 2017) (online at www.nytimes.com/2017/01/19/us/politics/trump-international-hotel-ethics.html); *The Controversial Billionaire Trump Ally with His Eyes on Chelsea: New York Jets Owner Woody Johnson, 74, Faced Racism and Sexism Claims When UK Ambassador, Lives in Trump Tower with His Actress Wife, 57, and Once Rode Across America with Michael Douglas*, Daily Mail (Mar. 16, 2022) (online at www.dailymail.co.uk/news/article-10619359/The-controversial-past-Woody-Johnson-tabled-2bn-bid-buy-Chelsea.html). Notably, reports indicate that former President Trump worked to ensure his D.C. hotel reaped financial benefits from his presidential inauguration by raising its minimum room rate to \$735 and even charging \$500,000 for a luxury suite with “various perks” at that time.

¹⁰⁴ *Trump Picks Jets Owner Woody Johnson as U.S. Ambassador to Britain*, Washington Post (Jan. 19, 2017) (online at www.washingtonpost.com/world/national-security/trump-picks-jets-owner-woody-johnson-as-us-ambassador-to-britain/2017/01/19/7d041ed6-de8b-11e6-918c-99ede3c8cafa_story.html).

period covered by the records.¹⁰⁵ All of these stays occurred while he served as U.S. Ambassador to the United Kingdom.¹⁰⁶

Of potentially much greater benefit to Mr. Trump’s business interests was Mr. Johnson’s reported use of his official position to attempt to steer the British Open to Mr. Trump’s Turnberry Golf Club in Scotland—a business that was losing money at the time. In a story originally published in July 2020 and updated in July 2021, the *New York Times*, citing three people familiar with the episode, reported that Mr. Johnson “told multiple colleagues in February 2018” that he had been asked by Mr. Trump to bring the tournament to his club. Sources say that Mr. Johnson was warned by his deputy chief of mission, Lewis A. Lukens, that it would be unethical for him to use his office to promote Mr. Trump’s club, “[b]ut Mr. Johnson apparently felt pressured to try” and shortly thereafter raised the idea with Scotland’s Secretary of State. According to the *Times*, “the episode left Mr. Lukens and other diplomats deeply unsettled.” Mr. Johnson forced out Mr. Lukens a few months later. Ambassador Johnson’s pitch was ultimately unsuccessful, and Mr. Trump’s club did not host the Open.¹⁰⁷

In July 2020, *CNN* reported that former Ambassador Johnson was the subject of an investigation by the State Department Office of Inspector General (OIG) regarding allegations that he “sought to use his government position to benefit the President’s personal business.”¹⁰⁸ While the full results of the State Department OIG’s review of the former Ambassador’s actions were not made public, in its *Semi-Annual Report to the Congress: October 1, 2020 to March 31, 2021*, the State Department OIG reported about an “investigation regarding multiple allegations of misconduct by a U.S. Ambassador” that had been opened on May 29, 2019.¹⁰⁹ In an apparent reference to former Ambassador Johnson, the State Department OIG wrote the following regarding its investigation of him:

The investigation revealed the Ambassador inappropriately used his position to try to influence the move of a professional sporting event to a different venue. He

¹⁰⁵ MAZARS-OVERSIGHT_COMMITTEE-00028984; MAZARS-OVERSIGHT_COMMITTEE-00028987; MAZARS-OVERSIGHT_COMMITTEE-00028991; MAZARS-OVERSIGHT_COMMITTEE-00028997; MAZARS-OVERSIGHT_COMMITTEE-00029004; MAZARS-OVERSIGHT_COMMITTEE-00030811.

¹⁰⁶ U.S. Department of State, Office of the Historian, *Robert Wood Johnson IV* (online at <https://history.state.gov/departmenthistory/people/johnson-robert-wood>) (accessed Sept. 6, 2024); U.S. Embassy & Consulates in the United Kingdom, *American Ambassadors to the United Kingdom* (online at <https://uk.usembassy.gov/our-relationship/rcambex/>) (accessed Aug. 6, 2024).

¹⁰⁷ *Trump’s Request of an Ambassador: Get the British Open for Me*, *New York Times* (July 16, 2021) (online at www.nytimes.com/2020/07/21/world/europe/trump-british-open.html).

¹⁰⁸ *NFL Owner and Trump Ambassador to UK Sparks Watchdog Inquiry over Allegations of Racist and Sexist Remarks and Push to Promote Trump Business*, *CNN* (July 22, 2020) (online at <https://edition.cnn.com/2020/07/22/politics/woody-johnson-oig-report/index.html>).

¹⁰⁹ U.S. Department of State, Office of Inspector General, *Semi-Annual Report to the Congress: October 1, 2020 to March 31, 2021* (online at www.stateoig.gov/uploads/report/report_pdf_file/spring_2021_semiannual_report_to_the_congress.pdf).

also knowingly allowed his special assistant to conduct personal matters that fell outside of her scope of official duties, and while using non-Department email accounts, he did not courtesy copy or forward to his official Department email account at least 62 official emails in the span of approximately 6 months.¹¹⁰

Separately, a periodic State Department OIG review of the American embassy in London, released in August 2020 as *Inspection of Embassy London and Constituent Posts, United Kingdom*, found “through employee questionnaires and interviews, that the Ambassador sometimes made inappropriate or insensitive comments on topics generally considered Equal Employment Opportunity (EEO)-sensitive, such as religion, sex, or color.”¹¹¹ The State Department OIG stated that these findings warranted “a more thorough review.”¹¹² The report did not provide additional details about these findings, but *CNN* reported in an exclusive that, among other offensive statements, former Ambassador Johnson “made racist generalizations about Black men and questioned why the Black community celebrates Black History Month.”¹¹³

- **Richard Grenell, U.S. Ambassador to Germany (2018–2020); Special Envoy for Peace Negotiations for Serbia and Kosovo (2019–2021); Acting Director of National Intelligence (2020):**¹¹⁴ In addition to being a Trump hotel regular, Richard Grenell, former President Trump’s Ambassador to Germany, has been one of Mr. Trump’s fiercest allies. He is poised to become a powerful part of a future Trump Administration—potentially even Secretary of State.¹¹⁵

¹¹⁰ *Id.*

¹¹¹ U.S. Department of State, Office of Inspector General, *Inspection of Embassy London and Constituent Posts, United Kingdom* (Aug. 2020) (online at www.stateoig.gov/uploads/report/report_pdf_file/isp-i-20-12_1.pdf).

¹¹² *Id.*

¹¹³ *NFL Owner and Trump Ambassador to UK Sparks Watchdog Inquiry over Allegations of Racist and Sexist Remarks and Push to Promote Trump Business*, *CNN* (July 22, 2020) (online at <https://edition.cnn.com/2020/07/22/politics/woody-johnson-oig-report/index.html>).

¹¹⁴ U.S. Department of State, Office of the Historian, *Richard A. Grenell* (online at <https://history.state.gov/departmenthistory/people/grenell-richard-a>) (accessed Sept. 10, 2024); *Trump Names Ric Grenell His Special Envoy for Serbia and Kosovo*, *Politico* (Oct. 4, 2019) (online at www.politico.eu/article/trump-names-ric-grenell-his-special-envoy-for-serbia-and-kosovo/); *Trump to Name Richard Grenell, U.S. Ambassador to Germany, as Acting Head of Intelligence*, *Washington Post* (Feb. 19, 2020) (online at www.washingtonpost.com/national-security/trump-to-name-richard-grenell-us-ambassador-to-germany-as-acting-head-of-intelligence/2020/02/19/640a0716-536c-11ea-929a-64efa7482a77_story.html); Office of the Director of National Intelligence, *Press Release: Statement by Director of National Intelligence John Ratcliffe* (May 26, 2020) (online at www.dni.gov/index.php/newsroom/press-releases/press-releases-2020/3456-statement-by-director-of-national-intelligence-john-ratcliffe); *US Ambassador to Germany Resigns from Post, Deputy Stands in*, *Associated Press* (June 2, 2020) (online at <https://apnews.com/us-ambassador-to-germany-resigns-from-post-deputy-stands-in-115317ce2912b15d7f99a8584e50fb7a>); *Trump ‘Shadow Diplomacy’? Deploys ‘Ambassador’ To Address Serbia-Kosovo Tensions*, *Forbes* (updated Apr. 21, 2022) (online at www.forbes.com/sites/nicholasreimann/2021/11/11/trump-shadow-diplomacy-deploys-ambassador-to-address-serbia-kosovo-tensions/).

¹¹⁵ *He Threw ‘Spaghetti at the Wall’ for Trump. Now He’s After a Top Job*, *New York Times* (May 28, 2024) (online at www.nytimes.com/2024/05/25/us/politics/grenell-trump-cabinet.html).

A communications specialist, Mr. Grenell has long been an attack dog for Mr. Trump, whom he has supported since then-candidate Trump became the Republican presidential nominee in 2016. Despite lacking diplomatic experience, Mr. Grenell rose through the ranks in the Trump Administration, where he served in multiple high-level—and very sensitive—policy positions.¹¹⁶ Mr. Grenell was nominated by President Trump to serve as U.S. Ambassador to Germany, and he held that position from April 2018 through June 2020.¹¹⁷ During his tenure as ambassador, he was also designated by former President Trump to be Special Presidential Envoy for Serbia and Kosovo Peace Negotiations, a position he held from October 2019 through January 2021.¹¹⁸ Later, Mr. Grenell served as Director of National Intelligence from February 2020 through May 2020.¹¹⁹ Mr. Grenell was a key player in President Trump’s “stop the steal” sham, despite reportedly admitting to colleagues that he knew such claims were baseless. After Trump’s presidency, he has entered into international business ventures with Donald Trump’s son-in-law and former Senior Advisor, Jared Kushner, apparently leveraging the foreign contacts he made as the Special Envoy for Serbia and Kosovo. Mr. Grenell is now reportedly angling to serve as Secretary of State during a second Trump presidency.¹²⁰

Mr. Grenell’s all-encompassing loyalty extended to Mr. Trump’s private business as well. Over the course of the 11 months covered by the records provided by Mazars, Mr. Grenell had a total of four stays at President Trump’s D.C. hotel, totaling 19 nights, and costing nearly \$10,000.¹²¹ Half of those stays took place while Mr. Grenell served as

¹¹⁶ *Id.*; *Trump Offers Job Of German Ambassador To Richard Grenell*, CNN (July 20, 2017) (online at www.cnn.com/2017/07/20/politics/trump-richard-grenell-germany-ambassador/index.html).

¹¹⁷ GovInfo, *Digest of Other White House Announcements 2017* (online at www.govinfo.gov/content/pkg/DCPD-2017DIGEST/html/DCPD-2017DIGEST.htm); U.S. Department of State, Office of the Historian, *Richard A. Grenell* (online at <https://history.state.gov/departmenthistory/people/grenell-richard-a>) (accessed Sept. 10, 2024); *US Ambassador to Germany Resigns from Post, Deputy Stands in*, Associated Press (June 2, 2020) (online at <https://apnews.com/us-ambassador-to-germany-resigns-from-post-deputy-stands-in-115317ce2912b15d7f99a8584e50fb7a>).

¹¹⁸ *Trump Names Ric Grenell His Special Envoy for Serbia and Kosovo*, Politico (Oct. 4, 2019) (online at www.politico.eu/article/trump-names-ric-grenell-his-special-envoy-for-serbia-and-kosovo/); *Trump ‘Shadow Diplomacy’? Deploys ‘Ambassador’ To Address Serbia-Kosovo Tensions*, Forbes (updated Apr. 21, 2022) (online at www.forbes.com/sites/nicholasreimann/2021/11/11/trump-shadow-diplomacy-deploys-ambassador-to-address-serbia-kosovo-tensions/).

¹¹⁹ *Trump to Name Richard Grenell, U.S. Ambassador to Germany, as Acting Head of Intelligence*, Washington Post (Feb. 19, 2020) (online at www.washingtonpost.com/national-security/trump-to-name-richard-grenell-us-ambassador-to-germany-as-acting-head-of-intelligence/2020/02/19/640a0716-536c-11ea-929a-64efa7482a77_story.html); *Trump Names Staunch Loyalist and Current US Ambassador to Germany Richard Grenell as Acting Intelligence Chief*, CNN (Feb. 20, 2020) (online at www.cnn.com/2020/02/19/politics/trump-grenell-acting-dni/index.html).

¹²⁰ *He Threw ‘Spaghetti at the Wall’ for Trump. Now He’s After a Top Job*, New York Times (May 28, 2024) (online at www.nytimes.com/2024/05/25/us/politics/grenell-trump-cabinet.html).

¹²¹ MAZARS-OVERSIGHT_COMMITTEE-00018371; MAZARS-OVERSIGHT_COMMITTEE-00018376; MAZARS-OVERSIGHT_COMMITTEE-00018381; MAZARS-OVERSIGHT_COMMITTEE-00018386; MAZARS-OVERSIGHT_COMMITTEE-00018391; MAZARS-OVERSIGHT_COMMITTEE-00018398; MAZARS-OVERSIGHT_COMMITTEE-00018409; MAZARS-OVERSIGHT_COMMITTEE-00018421; MAZARS-OVERSIGHT_COMMITTEE-00018999; MAZARS-OVERSIGHT_COMMITTEE-

U.S. Ambassador to Germany.¹²² Notably, Mr. Grenell stayed at the hotel during key moments in his nomination process, including on September 27, 2017—the night after his nomination hearing before the Senate Committee on Foreign Relations¹²³—and on April 26, 2018, the day that the Senate voted to confirm him as Ambassador to Germany and that he entered government duty.¹²⁴ That summer, Ambassador Grenell also joined Ambassadors Craft and McMullen in staying at the hotel while in town on official business to attend the June 2018 SelectUSA conference hosted by the U.S. Department of Commerce and held in neighboring Maryland.¹²⁵ Like his two fellow ambassadors, he chose to stay ten miles away from the conference venue and brave a 24–50 minute commute for the privilege of staying at—and paying—his boss’s hotel.¹²⁶ And it was just this kind of brand loyalty that ensured that Mr. Grenell also attained status as a “‘Gold’ level member of the Trump Organization’s ‘Trump Card’ loyalty program.”¹²⁷

00019006; MAZARS-OVERSIGHT_COMMITTEE-00029724; MAZARS-OVERSIGHT_COMMITTEE-00029736; MAZARS-OVERSIGHT_COMMITTEE-00029748; MAZARS-OVERSIGHT_COMMITTEE-00029759; MAZARS-OVERSIGHT_COMMITTEE-00029769; MAZARS-OVERSIGHT_COMMITTEE-00029777; MAZARS-OVERSIGHT_COMMITTEE-00030256; MAZARS-OVERSIGHT_COMMITTEE-00030267; MAZARS-OVERSIGHT_COMMITTEE-00030275.

¹²² U.S. Department of State, Office of the Historian, *Richard A. Grenell* (online at <https://history.state.gov/departmenthistory/people/grenell-richard-a>) (accessed Sept. 10, 2024).

¹²³ Senate Committee on Foreign Relations, *Nominations Hearing* (Sept. 27, 2017) (online at www.foreign.senate.gov/hearings/nominations-092717pm).

¹²⁴ U.S. Senate, Vote to Confirm Nomination of Richard Grenell, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Federal Republic of Germany (Apr. 26, 2018) (56 yeas, 42 nays) (online at www.congress.gov/nomination/115th-congress/1383); U.S. Department of State, Office of the Historian, *Richard A. Grenell* (online at <https://history.state.gov/departmenthistory/people/grenell-richard-a>) (accessed Sept. 10, 2024).

¹²⁵ U.S. Department of State, *Press Briefing with Gilbert Kaplan, Under Secretary of Commerce for International Trade, on the 2018 SelectUSA Investment Summit*; (June 14, 2018) (online at <https://2017-2021.state.gov/the-2018-selectusa-investment-summit/>); Select Summit USA, *About the SelectUSA Investment Summit* (online at www.selectusasummit.us/About/About-the-Investment-Summit) (accessed Aug. 9, 2024); U.S. Embassy & Consulates in the United Kingdom, *Save the Date for SelectUSA 2018* (online at <https://uk.usembassy.gov/save-date-selectusa-2018/>) (accessed Aug. 9, 2024).

¹²⁶ A search of Google Maps shows the distance between the Trump D.C. Hotel (present day Waldorf Astoria) to the Gaylord National Resort & Convention Center is 10.3 miles. Departing on June 20, 2018, at 3:30 pm, Google’s estimated time of travel was “typically 24-50 min.” (Google Maps, *Directions from Trump International Hotel, D.C. (present day Waldorf Astoria) to Gaylord National Resort & Convention Center* (online at www.google.com/maps/dir/Waldorf+Astoria+Washington+DC,+Pennsylvania+Avenue+Northwest,+Washington,+DC/Gaylord+National+Resort+%26+Convention+Center,+Waterfront+Street,+National+Harbor,+MD/@38.8374122,-77.0907545,12z/data=!3m1!4b1!4m1!7!4m1!6!1m5!1m1!1s0x89b7b79a1dfd66e9:0xd45a6a779f430162!2m2!1d-77.027582!2d38.894108!1m5!1m1!1s0x89b7b0730bf2c4b9:0xa0869d3ec47e8d52!2m2!1d-77.0158602!2d38.7807742!2m3!6e0!7e2!8j1529508600) (accessed Aug. 22, 2024)).

¹²⁷ *Trump to Name Richard Grenell, U.S. Ambassador to Germany, as Acting Head of Intelligence*, Washington Post (Feb. 19, 2020) (online at www.washingtonpost.com/national-security/trump-to-name-richard-grenell-us-ambassador-to-germany-as-acting-head-of-intelligence/2020/02/19/640a0716-536c-11ea-929a-64efa7482a77_story.html).

- **David Cornstein, U.S. Ambassador to Hungary (2018–2020):**¹²⁸ Mr. David Cornstein—former President Trump’s Ambassador to Hungary—stayed at Trump’s D.C. hotel on ten nights between December 2017 and June 2018 spending \$6,329. Mr. Cornstein stayed at the hotel on six occasions. The limited Mazars documents provided to the Committee show one stay by Mr. Cornstein before his nomination was announced, with the remaining stays taking place after he was nominated and, in some instances, after he assumed his duties. In each of May and June 2018, he stayed at former President Trump’s D.C. hotel while he served as Ambassador to Hungary, spending nearly \$2,500.¹²⁹

In addition to putting money into former President Trump’s pocket through those stays, Mr. Cornstein and his wife were members of the Trump International Golf Club in West Palm Beach—reportedly making Mr. Cornstein one among eight current or former members of Donald Trump’s golf clubs or of his Mar-a-Lago club whom the former President appointed to an ambassadorship or other government position, according to reporting from *USA Today* in February 2019.¹³⁰

Ambassador Cornstein, who came into his diplomatic post in Hungary with no prior diplomatic experience, immediately began to cozy up to the country’s autocratic prime minister, Viktor Orbán. In October 2019, the *New York Times* reported that after Mr. Cornstein assumed his post in Hungary, he “assiduously courted Mr. Orban, giving the Hungarian leader unexpected influence in the Trump administration.”¹³¹ Reportedly, while serving as U.S. Ambassador to Hungary, Mr. Cornstein exchanged text messages with Mr. Orbán and his staff members, “occasionally from personal devices;” took “positions contrary to United States policy;” and maintained his ties with Mr. Orbán even though State Department officials warned him the Hungarian government was “trying to manipulate him.”¹³²

According to *CNN*, Ambassador Cornstein was “instrumental” in organizing a meeting between Prime Minister Orbán and former President Trump that occurred at the

¹²⁸ U.S. Department of State, Office of the Historian, *David B. Cornstein* (online at <https://history.state.gov/departmenthistory/people/cornstein-david-b>) (accessed Sept. 10, 2024); U.S. Embassy in Hungary, *David B. Cornstein, U.S. Ambassador to Hungary* (online at <https://hu.usembassy.gov/david-b-cornstein-u-s-ambassador-to-hungary-2018-2020/>) (accessed Aug. 20, 2024).

¹²⁹ MAZARS-OVERSIGHT_COMMITTEE-00018985; MAZARS-OVERSIGHT_COMMITTEE-00029749; MAZARS-OVERSIGHT_COMMITTEE-00029759; MAZARS-OVERSIGHT_COMMITTEE-00029870; MAZARS-OVERSIGHT_COMMITTEE-00030002; MAZARS-OVERSIGHT_COMMITTEE-00030067; MAZARS-OVERSIGHT_COMMITTEE-00030072; MAZARS-OVERSIGHT_COMMITTEE-00030124; MAZARS-OVERSIGHT_COMMITTEE-00030134; MAZARS-OVERSIGHT_COMMITTEE-00030142.

¹³⁰ *Trump Picks Golf Club, Mar-a-Lago Members as Ambassadors*, *USA Today* (Feb. 10, 2019) (online at www.usatoday.com/story/news/investigations/2019/02/08/donald-trump-picks-ambassadors-golf-club-mar-lago-members/2748260002/).

¹³¹ *In Hungary, a Freewheeling Trump Ambassador Undermines U.S. Diplomats*, *New York Times* (Oct. 22, 2019) (online at www.nytimes.com/2019/10/22/world/europe/david-cornstein-hungary-trump-orban.html).

¹³² *Id.*

White House in May 2019.¹³³ Ambassador Cornstein later commented to the *Atlantic* that former President Trump envied the situation of Hungary’s autocratic leader, saying, “I can tell you, knowing the president for a good 25 or 30 years, that he would love to have the situation that Viktor Orbán has, but he doesn’t.”¹³⁴

- **Edward McMullen, U.S. Ambassador to Switzerland and Liechtenstein (2017–2021):**¹³⁵ Over the 11 months covered by the guest logs provided by Mazars, Ambassador McMullen made two separate visits, totaling eight nights, to the Trump Hotel, racking up a bill of nearly \$5,000.¹³⁶ Mr. McMullen’s first stay at the hotel coincided with his confirmation hearing before the Senate Committee on Foreign Relations, which was held on September 27, 2017.¹³⁷ His second stay took place while, as U.S. Ambassador to Switzerland and Liechtenstein, he was in Washington, D.C., to attend the SelectUSA economic development summit, a conference hosted by the U.S. Department of Commerce, that brought him and more than a dozen other ambassadors to the D.C. area.¹³⁸ Notably, while the conference was held at the Gaylord National Resort and Convention Center in National Harbor, Maryland, like Ambassadors Craft and Grenell, Ambassador McMullen *also* opted to stay in downtown Washington, D.C., rather than at the conference venue or any number of hotels that, although located in closer proximity to the conference, did not connect directly to President Trump’s pocket.¹³⁹

¹³³ *US Ambassador to Hungary to Step Down*, CNN (Sept. 15, 2020) (online at www.cnn.com/2020/09/15/politics/us-ambassador-to-hungary-stepping-down/index.html).

¹³⁴ *Viktor Orbán’s War on Intellect*, The Atlantic (June 2019) (online at www.theatlantic.com/magazine/archive/2019/06/george-soros-viktor-orban-ceu/588070/).

¹³⁵ U.S. Department of State, Office of the Historian, *Edward T. McMullen Jr.* (online at <https://history.state.gov/departmenthistory/people/mcmullen-edward-t-jr>) (accessed Sept. 6, 2024); U.S. Embassy Bern (@USEmbassyBern), X (Dec. 7, 2017) (online at <https://x.com/USEmbassyBern/status/938694082804805633>).

¹³⁶ MAZARS-OVERSIGHT_COMMITTEE-00018411; MAZARS-OVERSIGHT_COMMITTEE-00018423; MAZARS-OVERSIGHT_COMMITTEE-00030245; MAZARS-OVERSIGHT_COMMITTEE-00030256; MAZARS-OVERSIGHT_COMMITTEE-00030267; MAZARS-OVERSIGHT_COMMITTEE-00030275; MAZARS-OVERSIGHT_COMMITTEE-00030282; MAZARS-OVERSIGHT_COMMITTEE-00030291.

¹³⁷ Senate Committee on Foreign Relations, *Nominations Hearing* (Sept. 27, 2017) (online at www.foreign.senate.gov/hearings/nominations-092717pm).

¹³⁸ U.S. Department of State, *Press Briefing with Gilbert Kaplan, Under Secretary of Commerce for International Trade, on the 2018 SelectUSA Investment Summit* (June 14, 2018) (online at <https://2017-2021.state.gov/the-2018-selectusa-investment-summit/>); Select Summit USA, *About the SelectUSA Investment Summit* (online at www.selectusasummit.us/About/About-the-Investment-Summit) (accessed Aug. 9, 2024); U.S. Embassy & Consulates in the United Kingdom, *Save the Date for SelectUSA 2018* (online at <https://uk.usembassy.gov/save-date-selectusa-2018/>) (accessed Aug. 9, 2024).

¹³⁹ U.S. Embassy & Consulates in the United Kingdom, *Save the Date – SelectUSA Summit 2018* (online at <https://uk.usembassy.gov/save-date-selectusa-2018/>) (accessed Aug. 9, 2024). A search of Google Maps shows the distance between the Trump D.C. Hotel (present day Waldorf Astoria) to the Gaylord National Resort & Convention Center is 10.3 miles. Departing on June 20, 2018, at 3:30 pm, Google’s estimated time of travel was “typically 24–50 min.” (Google Maps, *Directions from Trump International Hotel, D.C. (present day Waldorf Astoria) to Gaylord National Resort & Convention Center* (online at www.google.com/maps/dir/Waldorf+Astoria+Washington+DC,+Pennsylvania+Avenue+Northwest,+Washington,+DC/Gaylord+National+Resort+%26+Convention+Center,+Waterfront+Street,+National+Harbor,+MD/@38.8374122,

- **W. Robert Kohorst, U.S. Ambassador to Croatia (2017–2021):**¹⁴⁰ Ambassador Kohorst was a frequent guest of the Trump International Hotel in Washington, D.C., during the 11-month period covered by the records available to the Committee. Mr. Kohorst stayed a total of 39 nights from September through December, 2017, spending \$25,160, including more than \$5,000 spent after his appointment on November 20, 2017.¹⁴¹ Repeating the pattern of many of the other former Trump Administration ambassadors discussed in this report, Mr. Kohorst found former President’s D.C. hotel to be a very convenient place to stay during his nominations process, including on the nights surrounding his appearance before the Senate Committee on Foreign Relations for his October 5, 2017, nomination hearing.¹⁴²
- **Carla Sands, U.S. Ambassador to Denmark (2017–2021):**¹⁴³ Ambassador Sands stayed at former President Trump’s D.C. hotel 34 nights across the months of September, October, and November 2017 and again in April, 2018, spending \$23,540, including

-77.0907545,12z/data=!3m1!4b1!4m17!4m16!1m5!1m1!1s0x89b7b79a1dfd66e9:0xd45a6a779f430162!2m2!1d-77.027582!2d38.894108!1m5!1m1!1s0x89b7b0730bf2c4b9:0xa0869d3ec47e8d52!2m2!1d-77.0158602!2d38.7807742!2m3!6e0!7e2!8j1529508600) (accessed Aug. 22, 2024)).

¹⁴⁰ U.S. Department of State, Office of the Historian, *W. Robert Kohorst* (online at <https://history.state.gov/departmenthistory/people/kohorst-w-robert>) (accessed Sept. 10, 2024); Ambassador Nathalie Rayes (@USAmbCroatia), X (Jan. 20, 2021) (online at <https://x.com/USAmbCroatia/status/1351955597265141762>).

¹⁴¹ MAZARS-OVERSIGHT_COMMITTEE-00018366; MAZARS-OVERSIGHT_COMMITTEE-00018371; MAZARS-OVERSIGHT_COMMITTEE-00018377; MAZARS-OVERSIGHT_COMMITTEE-00018382; MAZARS-OVERSIGHT_COMMITTEE-00018387; MAZARS-OVERSIGHT_COMMITTEE-00018391; MAZARS-OVERSIGHT_COMMITTEE-00018399; MAZARS-OVERSIGHT_COMMITTEE-00018410; MAZARS-OVERSIGHT_COMMITTEE-00018422; MAZARS-OVERSIGHT_COMMITTEE-00018430; MAZARS-OVERSIGHT_COMMITTEE-00018436; MAZARS-OVERSIGHT_COMMITTEE-00018444; MAZARS-OVERSIGHT_COMMITTEE-00018457; MAZARS-OVERSIGHT_COMMITTEE-00018467; MAZARS-OVERSIGHT_COMMITTEE-00018478; MAZARS-OVERSIGHT_COMMITTEE-00018483; MAZARS-OVERSIGHT_COMMITTEE-00018491; MAZARS-OVERSIGHT_COMMITTEE-00018497; MAZARS-OVERSIGHT_COMMITTEE-00018509; MAZARS-OVERSIGHT_COMMITTEE-00018516; MAZARS-OVERSIGHT_COMMITTEE-00018525; MAZARS-OVERSIGHT_COMMITTEE-00018535; MAZARS-OVERSIGHT_COMMITTEE-00018547; MAZARS-OVERSIGHT_COMMITTEE-00018558; MAZARS-OVERSIGHT_COMMITTEE-00018568; MAZARS-OVERSIGHT_COMMITTEE-00018576; MAZARS-OVERSIGHT_COMMITTEE-00018581; MAZARS-OVERSIGHT_COMMITTEE-00018587; MAZARS-OVERSIGHT_COMMITTEE-00018593; MAZARS-OVERSIGHT_COMMITTEE-00018599; MAZARS-OVERSIGHT_COMMITTEE-00018923; MAZARS-OVERSIGHT_COMMITTEE-00018927; MAZARS-OVERSIGHT_COMMITTEE-00018935; MAZARS-OVERSIGHT_COMMITTEE-00018940; MAZARS-OVERSIGHT_COMMITTEE-00018945; MAZARS-OVERSIGHT_COMMITTEE-00018953; MAZARS-OVERSIGHT_COMMITTEE-00018964; MAZARS-OVERSIGHT_COMMITTEE-00018974; MAZARS-OVERSIGHT_COMMITTEE-00018982; U.S. Department of State, Office of the Historian, *W. Robert Kohorst* (online at <https://history.state.gov/departmenthistory/people/kohorst-w-robert>) (accessed Sept. 6, 2024).

¹⁴² Senate Committee on Foreign Relations, *Nominations Hearing* (Oct. 5, 2017) (online at www.foreign.senate.gov/hearings/nominations-100517p).

¹⁴³ U.S. Department of State, Office of the Historian, *Carla H. Sands* (online at <https://history.state.gov/departmenthistory/people/sands-carla-h>) (accessed Sept. 10, 2024).

\$1,785 after she was appointed as Ambassador.¹⁴⁴ Ms. Sands had her confirmation hearing before the Senate Committee on Foreign Relations on October 5, 2017—which for her was also just another day at President Trump’s D.C. hotel.¹⁴⁵

Federal Judges

From the limited records that Mazars produced to the Committee, Democratic staff have identified four federal judges appointed by President Trump who stayed at former President Trump’s D.C. hotel during key steps in their confirmation processes. At the time of these stays, three of these individuals were either state judges or a federal magistrate judge, and the payments associated with each of these stays would violate the Constitution’s Domestic Emoluments Clause to the extent they involved any taxpayer funds. After being nominated by President Trump, all three of these individuals were confirmed by the Senate and now hold lifetime tenure. Together, they spent more than \$7,500 at former President Trump’s D.C. hotel during just the 11-month period covered by the room records provided to the Committee by Mazars.

- **Elizabeth L. Branch, U.S. Circuit Judge, U.S. Court of Appeals for the Eleventh Circuit (2018–Present):**¹⁴⁶ Judge Branch stayed at Trump’s D.C. hotel when she was in town for her December 13, 2017, Senate Judiciary Committee confirmation hearing on her nomination to be a judge on the U.S. Court of Appeals for the Eleventh Circuit, spending \$1,418 on rooms the nights of December 11 through December 13, 2017.¹⁴⁷ At

¹⁴⁴ *Id.*; MAZARS-OVERSIGHT_COMMITTEE-00018394; MAZARS-OVERSIGHT_COMMITTEE-00018403; MAZARS-OVERSIGHT_COMMITTEE-00018415; MAZARS-OVERSIGHT_COMMITTEE-00018426; MAZARS-OVERSIGHT_COMMITTEE-00018433; MAZARS-OVERSIGHT_COMMITTEE-00018440; MAZARS-OVERSIGHT_COMMITTEE-00018453; MAZARS-OVERSIGHT_COMMITTEE-00018461; MAZARS-OVERSIGHT_COMMITTEE-00018472; MAZARS-OVERSIGHT_COMMITTEE-00018483; MAZARS-OVERSIGHT_COMMITTEE-00018490; MAZARS-OVERSIGHT_COMMITTEE-00018497; MAZARS-OVERSIGHT_COMMITTEE-00018570; MAZARS-OVERSIGHT_COMMITTEE-00018577; MAZARS-OVERSIGHT_COMMITTEE-00018582; MAZARS-OVERSIGHT_COMMITTEE-00018588; MAZARS-OVERSIGHT_COMMITTEE-00018640; MAZARS-OVERSIGHT_COMMITTEE-00018645; MAZARS-OVERSIGHT_COMMITTEE-00018652; MAZARS-OVERSIGHT_COMMITTEE-00018660; MAZARS-OVERSIGHT_COMMITTEE-00018670; MAZARS-OVERSIGHT_COMMITTEE-00018677; MAZARS-OVERSIGHT_COMMITTEE-00018684; MAZARS-OVERSIGHT_COMMITTEE-00018691; MAZARS-OVERSIGHT_COMMITTEE-00018695; MAZARS-OVERSIGHT_COMMITTEE-00018824; MAZARS-OVERSIGHT_COMMITTEE-00018829; MAZARS-OVERSIGHT_COMMITTEE-00018851; MAZARS-OVERSIGHT_COMMITTEE-00018863; MAZARS-OVERSIGHT_COMMITTEE-00018874; MAZARS-OVERSIGHT_COMMITTEE-00018885; MAZARS-OVERSIGHT_COMMITTEE-00016869; MAZARS-OVERSIGHT_COMMITTEE-00016879; MAZARS-OVERSIGHT_COMMITTEE-00016889.

¹⁴⁵ U.S. Senate Committee on Foreign Relations, *Nominations Hearing* (Oct. 5, 2017) (online at www.foreign.senate.gov/hearings/nominations-100517p).

¹⁴⁶ Federal Judicial Center, *Branch, Elizabeth Lee* (online at www.fjc.gov/history/judges/branch-elizabeth-lee) (accessed Sept. 9, 2024); American Law Institute, *The Hon. Elizabeth L. Branch* (Mar. 20, 2018) (online at www.ali.org/members/member/335313/) (accessed Aug. 23, 2024); Email from Congressional Research Services to Committee on Oversight and Accountability, Minority Staff (Sept. 16, 2024).

¹⁴⁷ U.S. Senate Committee on the Judiciary, *Nominations Hearing* (Dec. 13, 2017) (online at www.judiciary.senate.gov/committee-activity/hearings/12/13/2017/nominations); MAZARS-OVERSIGHT_COMMITTEE-00019003; MAZARS-OVERSIGHT_COMMITTEE-00019011; MAZARS-OVERSIGHT_COMMITTEE-00019017.

the time of this stay, Ms. Branch was a judge on the Georgia Court of Appeals. Ms. Branch stayed at the Trump hotel again on March 21 and March 22, 2018—the two days immediately after she entered duty as a federal judge on March 20, 2018—spending another \$1,352.¹⁴⁸

- **Rudolfo A. Ruiz II, U.S. District Judge, U.S. District Court for the Southern District of Florida (2019–Present):**¹⁴⁹ The first stay by Mr. Rudolfo Ruiz recorded in the limited room records available to the Committee occurred on the night of December 6, 2017, when he paid \$1,039.¹⁵⁰ According to his completed Questionnaire for Judicial Nominees, he met the next day with Senator Marco Rubio in Washington, D.C., as part of his effort to secure a position on the federal bench.¹⁵¹ At the time of his stay, Mr. Ruiz was a Florida state judge in the 11th Judicial Circuit of Florida.¹⁵² Apparently eager to cover all of his bases while he pursued his nomination, he stayed at former President Trump’s D.C. hotel again on February 8, 2018, paying \$534.65.¹⁵³ This was the night before he met with the Trump White House Counsel’s Office *and* the DOJ’s Office of Legal Policy (OLP) to discuss his prospective nomination.¹⁵⁴ Mr. Ruiz’s Senate confirmation hearing was held on June 20, 2018.¹⁵⁵ This milestone in his confirmation process gave Mr. Ruiz yet another opportunity to slip money into former President Trump’s D.C. hotel by renting a single room the nights of June 18 and June 21, and two rooms on each of the nights of June 19 and 20, spending \$3,076.¹⁵⁶

¹⁴⁸ MAZARS-OVERSIGHT_COMMITTEE-00029380; MAZARS-OVERSIGHT_COMMITTEE-00029390; Federal Judicial Center, *Branch, Elizabeth Lee* (online at www.fjc.gov/node/4237586) (accessed Sept. 3, 2024); Email from Congressional Research Services to Committee on Oversight and Accountability, Minority Staff (Sept. 16, 2024).

¹⁴⁹ Federal Judicial Center, *Ruiz, Rodolfo Armando II* (online at www.fjc.gov/history/judges/ruiz-rodolfo-armando-ii) (accessed Sept. 9, 2024).

¹⁵⁰ MAZARS-OVERSIGHT_COMMITTEE-00018974.

¹⁵¹ U.S. Senate Committee on the Judiciary, *Questionnaire for Judicial Nominees, Rodolfo “Rudy” Armando Ruiz II* (online at www.judiciary.senate.gov/imo/media/doc/Ruiz%20II%20SJQ.pdf) (accessed Aug. 5, 2024); MAZARS-OVERSIGHT_COMMITTEE-00029047.

¹⁵² The White House, *Press Release: President Donald J. Trump Announces Thirteenth Wave of Judicial Nominees and Seventh Wave of United States Marshal Nominees* (Apr. 26, 2018) (online at <https://trumpwhitehouse.archives.gov/presidential-actions/president-donald-j-trump-announces-thirteenth-wave-judicial-nominees-seventh-wave-united-states-marshal-nominees/>).

¹⁵³ U.S. Senate Committee on the Judiciary, *Questionnaire for Judicial Nominees, Rodolfo “Rudy” Armando Ruiz II* (online at www.judiciary.senate.gov/imo/media/doc/Ruiz%20II%20SJQ.pdf) (accessed Aug. 19, 2024); MAZARS-OVERSIGHT_COMMITTEE-00029047.

¹⁵⁴ U.S. Senate Committee on the Judiciary, *Questionnaire for Judicial Nominees, Rodolfo “Rudy” Armando Ruiz II* (online at www.judiciary.senate.gov/imo/media/doc/Ruiz%20II%20SJQ.pdf) (accessed Aug. 19, 2024).

¹⁵⁵ U.S. Senate Committee on the Judiciary, *Nominations Hearing* (June 20, 2018) (online at www.judiciary.senate.gov/committee-activity/hearings/06/20/2018/nominations).

¹⁵⁶ MAZARS-OVERSIGHT_COMMITTEE-00030245; MAZARS-OVERSIGHT_COMMITTEE-00030255; MAZARS-OVERSIGHT_COMMITTEE-00030266.

- **Bridget S. Bade, U.S. Circuit Judge, U.S. Court of Appeals for the Ninth Circuit (2019–Present):**¹⁵⁷ Ms. Bade—who was already a U.S. Magistrate Judge—stayed at former President Trump’s D.C. hotel on the night of April 5, 2018, paying \$394.¹⁵⁸ This was the night before her interview with attorneys from the White House Counsel’s Office and DOJ’s OLP about her prospective promotion to a new position on the federal bench.¹⁵⁹

State Government Officials

This report identifies two state officials and one delegation of state legislators that spent a combined total of \$9,472.80 at former President Trump’s D.C. hotel while on official or political business during the 11 months in 2017 and 2018 covered by room records Mazars provided to the Committee.

- **Delegation from the “Legislature of the U.S. Virgin Islands”:** According to the available records, a delegation from the U.S. Virgin Islands (U.S.V.I.) Legislature paid \$8,040 for a block of rooms for an entire week in November 2017 while in Washington, D.C., to advocate for hurricane relief assistance from the federal government.¹⁶⁰ U.S.V.I. Governor Kenneth Mapp was also reportedly in Washington, D.C., at that time, but it is unclear if he too stayed at former President Trump’s D.C. hotel.¹⁶¹
- **Indiana Governor Eric Holcomb (2017–Present):**¹⁶² Governor Eric Holcomb stayed at former President Trump’s D.C. hotel on the night of June 19, 2018, while in town to participate in the June 2018 SelectUSA Investment Summit organized by the U.S. Department of Commerce—a federal conference that also, as previously discussed, drew

¹⁵⁷ U.S. Courts for the Ninth Circuit, *The Judges of this Court in Order of Seniority* (Nov. 2023) (online at www.ca9.uscourts.gov/judicial-council/judges-seniority-list/) (accessed Oct. 1, 2024).

¹⁵⁸ U.S. Senate Committee on the Judiciary, *Questionnaire for Judicial Nominees, Bridget Shelton Bade* (online at www.judiciary.senate.gov/imo/media/doc/Bade%20SJQ.pdf) (accessed Aug. 5, 2024); MAZARS-OVERSIGHT_COMMITTEE-00016854.

¹⁵⁹ MAZARS-OVERSIGHT_COMMITTEE-00016854; Senate Committee on the Judiciary, *Questionnaire for Judicial Nominees, Bridget Shelton Bade* (online at www.judiciary.senate.gov/imo/media/doc/Bade%20SJQ.pdf) (accessed Aug. 5, 2024). According to her Questionnaire for Judicial Nominees, Ms. Bade also met with then-Senator Jeff Flake’s staff on April 6, 2018.

¹⁶⁰ MAZARS-OVERSIGHT_COMMITTEE-00018816; MAZARS-OVERSIGHT_COMMITTEE-00018824; MAZARS-OVERSIGHT_COMMITTEE-00018829; MAZARS-OVERSIGHT_COMMITTEE-00018849; MAZARS-OVERSIGHT_COMMITTEE-00018861; MAZARS-OVERSIGHT_COMMITTEE-00018872; MAZARS-OVERSIGHT_COMMITTEE-00018884; MAZARS-OVERSIGHT_COMMITTEE-00018891; MAZARS-OVERSIGHT_COMMITTEE-00018896; *Week of Lobbying: Delegation of VI Government Officials Descend on Washington with \$7.5 Billion Request*, The Virgin Islands Consortium (Nov. 12, 2017) (online at <https://wp.viconsortium.com/?p=58302>).

¹⁶¹ *Week of Lobbying: Delegation of VI Government Officials Descend on Washington with \$7.5 Billion Request*, The Virgin Islands Consortium (Nov. 12, 2017) (online at <https://wp.viconsortium.com/?p=58302>).

¹⁶² Indiana Historical Bureau, *List of Governors* (online at www.in.gov/history/about-indiana-history-and-trivia/governors-portraits/list-of-governors/) (accessed Sept. 26, 2024).

three of President Trump’s ambassadors to his D.C. hotel.¹⁶³ While Governor Holcomb was in Washington, D.C., he also took the opportunity to “catch up” with former Vice President Mike Pence.¹⁶⁴ Governor Holcomb’s stay at former President Trump’s D.C. hotel—which cost just under \$500—also coincided with a two-day summit hosted there by the pro-Trump super PAC America First Action on June 19 and June 20, 2018.¹⁶⁵

- **North Dakota Governor Doug Burgum (2016–Present):**¹⁶⁶ Governor Burgum stayed at the Trump International Hotel in D.C. on April 24 and April 25, 2018, spending \$940.¹⁶⁷ In his *Weekly Update* newsletter published April 28, 2018, Governor Burgum detailed business he conducted while in D.C., including meeting with then-Secretary of the Interior Ryan Zinke, and attending an event hosted by the Addiction Policy Forum, a D.C.-based nonprofit that aims to raise awareness around addiction.¹⁶⁸

Other Executive Branch Officials

Two executive branch officials other than the ambassadors discussed above also appear to have made expenditures at former President Trump’s D.C. hotel while they were in office. To

¹⁶³ MAZARS-OVERSIGHT_COMMITTEE-00030257; *Governor’s Calendar Events*, Indiana Governor Eric J. Holcomb (June 14–21, 2018) (online at <https://events.in.gov/gov/calendar/day/2018/6/14?days=8>); Governor Eric J. Holcomb, *Gov. Holcomb Will Participate in 2018 SelectUSA Investment Summit in Washington, D.C. June 20–21* (June 19, 2018) (online at <https://events.in.gov/event/gov-holcomb-will-participate-in-2018-selectusa-investment-summit-in-washington-dc-june-20-21>); U.S. Department of State, *Press Briefing with Gilbert Kaplan, Under Secretary of Commerce for International Trade, on the 2018 SelectUSA Investment Summit* (June 14, 2018) (online at <https://2017-2021.state.gov/the-2018-selectusa-investment-summit/>).

¹⁶⁴ Governor Eric J. Holcomb, *Gov. Holcomb Statement on Meeting with Vice President Pence Today* (June 20, 2018) (online at <https://events.in.gov/event/gov-holcomb-statement-on-meeting-with-vice-president-pence-today>).

¹⁶⁵ *Outside Trump Hotel, an Uproar: Inside, a Calm Sea of Conservative Cash*, New York Times (June 20, 2018) (online at www.nytimes.com/2018/06/20/us/politics/trump-donors-america-first.html). As noted, the documents provided to the Committee by Mazars do not include payment details about the funds or payment methods used to pay for any of the stays they record, including that of Governor Holcomb. On June 21, 2018, two days after Mr. Holcomb’s stay at the Trump International Hotel in Washington, D.C., on official business, a fundraising committee associated with the governor made two disbursements to Mr. Trump’s D.C. hotel for \$177.64 and \$256.70. There is no indication these two disbursements have any relationship to the \$492.80 that Mr. Holcomb was charged for a single room the night of June 19, 2018. Further, these two expenses together are less than the \$492.80 that Mr. Holcomb was charged for his room the night of June 19, 2018, according to documents from Mazars. Accordingly, this expenditure by the fundraising committee does not provide an indication that Mr. Holcomb used non-taxpayer funds to pay for his June 21 stay at the hotel. The relationship between the charge recorded in the Mazars documents and the payments recorded in the payment records from Mr. Holcomb’s PAC is unclear. (Federal Election Commission, Team Holcomb, Quarterly Report (July 15, 2018) (online at <https://docquery.fec.gov/cgi-bin/fecimg/?201903279145950681>)).

¹⁶⁶ State Historical Society of North Dakota, *Doug Burgum* (online at www.history.nd.gov/exhibits/governors/governors33.html) (accessed Aug. 22, 2024).

¹⁶⁷ MAZARS-OVERSIGHT_COMMITTEE-00029731; MAZARS-OVERSIGHT_COMMITTEE-0029743.

¹⁶⁸ Office of the Governor of North Dakota, Dakota Download, *Governor Burgum’s Weekly Update | April 28, 2018* (Apr. 28, 2018) (online at www.governor.nd.gov/sites/www/files/documents/newsletters/Dakota-Download-04-29-2018.pdf).

the extent that these expenditures involved any taxpayer funds, they would have violated the Domestic Emoluments Clause.

- **Steven Mnuchin, Secretary of the Treasury (2017–2021):**¹⁶⁹ Secretary Mnuchin spent much of the early part of 2017 staying at the Trump Hotel.¹⁷⁰ Because Secretary Mnuchin’s stay pre-dates the narrow period for which the Committee received detailed room records from Mazars, the Committee does not know the total cost of this stay nor can it verify former Secretary Mnuchin’s claim that he paid for his lodging himself.¹⁷¹ However, this lengthy stay did engender tens of thousands of dollars in constitutionally prohibited payments from the Secret Service to President Trump’s hotel. According to reporting by the *Washington Post*, during Mr. Mnuchin’s residence at the hotel, the Secret Service paid more than \$33,000 to stay at the hotel for 137 nights in a row for his security detail.¹⁷² The *Post* reported that the Secret Service’s room rental to protect former Secretary Mnuchin was “a steady rental at a time when only about 42 percent of rooms were occupied.”¹⁷³

Among the documents produced to the Committee by Mazars is an “Aging Summary Report” that was run on August 31, 2017, and that covers certain guest charges at the Trump International Hotel in Washington, D.C., over a range of charge dates. It records a charge to “Louise Linton [Mr. Mnuchin’s wife] and Steven Mnuchin” of \$26,866.36 for catering.¹⁷⁴ Given that Mr. Mnuchin was serving as Secretary of the Treasury at the time of this expenditure, the use of any taxpayer funds to pay these charges would have violated the Constitution’s prohibition on domestic emoluments.

- **Ivanka Trump, Advisor (2017–2021) and Jared Kushner, Senior Advisor (2017–2021):**¹⁷⁵ As previously discussed, Donald Trump’s daughter and son-in-law—who were

¹⁶⁹ U.S. Department of the Treasury, *Prior Secretaries* (online at <https://home.treasury.gov/about/history/prior-secretaries>) (accessed Aug. 22, 2024).

¹⁷⁰ *Secret Service Paid Trump’s D.C. Hotel More than \$33,000 for Lodging to Guard Treasury Secretary*, *Washington Post* (Apr. 30, 2020) (online at www.washingtonpost.com/politics/secret-service-paid-trumps-dc-hotel-more-than-33000-for-lodging-to-guard-treasury-secretary/2020/04/30/cd38e864-8987-11ea-ac8a-fe9b8088e101_story.html).

¹⁷¹ *Id.*

¹⁷² *Id.*

¹⁷³ *Id.*

¹⁷⁴ MAZARS-OVERSIGHT_COMMITTEE-00006711; *Mrs. Mnuchin, Hollywood Player? Louise Linton Plots Film Career Amid Capitol Hill Scrutiny*, *Hollywood Reporter* (Apr. 3, 2019) (online at www.hollywoodreporter.com/lifestyle/lifestyle-news/louise-linton-steven-mnuchins-wife-is-a-hollywood-player-trump-era-1198900/).

¹⁷⁵ Office of Government Ethics, *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Ivanka Trump) (Filed June 12, 2017) (online at www.politico.com/f/?id=00000161-87a8-d53a-a5f5-b7fc5f7f0001); Office of Government Ethics, *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Ivanka Trump) (Filed Jan. 18, 2021) (online at www.citizensforethics.org/wp-content/uploads/2021/02/Ivanka-Trump-2021-278TERM.pdf); *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Jared Kushner) (July 20, 2017) (online at <https://s3.documentcloud.org/documents/4451415/Kushner-Jared-AMENDEDfinalNE278.pdf>); Office of Government Ethics, *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Jared

also White House advisers in his Administration—were recorded in the limited records provided to the Committee by Mazars as having been charged a total of \$6,158.42 for 14 stays at former President Trump’s D.C.¹⁷⁶ It is unclear who paid for these stays, but if any taxpayer funds were used, such expenditures would have violated the Constitution’s Domestic Emoluments Clause.

Other Unethical Payments

Of the 30 examples of individuals who paid money to former President Trump’s D.C. hotel profiled in this report, 14 were not state or federal officials at the time they made their payments. Instead, they were individuals who sought—and, in all but one case, ultimately received—favours from President Trump, including plum appointments and presidential pardons, including:

- Four individuals who were nominated to be U.S. ambassadors (of which three were confirmed);
- Four individuals who served as Trump Administration officials or on a federal commission or board;
- One individual who was nominated to be a federal judge; and
- Five individuals who received pardons from former President Trump.

The limited records available to the Committee from Mazars covering just 11 months between September 2017 and August 2018 show these individuals collectively spent a combined total of 118 nights at former President Trump’s D.C. hotel for a cost of nearly \$85,000. These individuals are discussed in more detail below. Although these payments do not constitute constitutional violations, they do raise concerns of corrupt or pay-to-play schemes.

Ambassadors

The following individuals nominated by former President Trump to serve as U.S. ambassadors stayed at Trump’s D.C. hotel prior to their nominations. Unlike the eight ambassadors previously discussed, the limited records provided by Mazars do not reflect any payments they made while they served in government during the 11 months covered by the available hotel guest logs.

Kushner) (Filed Jan. 18, 2021) (online at www.citizensforethics.org/wp-content/uploads/2021/02/Jared-C-Kushner-2021-278TERM.pdf).

¹⁷⁶ MAZARS-OVERSIGHT_COMMITTEE-00021355; MAZARS-OVERSIGHT_COMMITTEE-00018328; MAZARS-OVERSIGHT_COMMITTEE-00018329; MAZARS-OVERSIGHT_COMMITTEE-00018361; MAZARS-OVERSIGHT_COMMITTEE-00018368; MAZARS-OVERSIGHT_COMMITTEE-00018373; MAZARS-OVERSIGHT_COMMITTEE-00018659; MAZARS-OVERSIGHT_COMMITTEE-00018898; MAZARS-OVERSIGHT_COMMITTEE-00018930; MAZARS-OVERSIGHT_COMMITTEE-00018938; MAZARS-OVERSIGHT_COMMITTEE-00019191; MAZARS-OVERSIGHT_COMMITTEE-00019277; MAZARS-OVERSIGHT_COMMITTEE-00019289; MAZARS-OVERSIGHT_COMMITTEE-00019346; MAZARS-OVERSIGHT_COMMITTEE-00016767. The expenditures tallied here include an amount taken from an “A/R Ledger” showing account receivables. Ivanka Trump and Jared Kushner’s expenditures at former President Trump’s D.C. hotel appear in their joint names, and they are therefore counted in this report as a single example.

- **Lynda C. Blanchard, U.S. Ambassador to the Republic of Slovenia (2019–2021):**¹⁷⁷ Ms. Blanchard is recorded in the limited records available to the Committee as having nine stays totaling 20 nights and costing more than \$11,000.¹⁷⁸ As all of her stays identified in the limited records provided by Mazars pre-dated her confirmation as an ambassador. However, she stayed at least nine nights in total at the hotel in June 2018 (after June 20, when her nomination was announced) and in August 2018, the end of the time period covered by the limited records available to the Committee.
- **Jeffrey Gunter, U.S. Ambassador to Iceland (2019–2021):**¹⁷⁹ The records available to the Committee show that Mr. Gunter stayed at the Trump International Hotel in D.C. the night of November 12, 2017, as well as on December 7 and 8, 2017, when he paid for two rooms each night.¹⁸⁰ These December dates coincided with a December 7, 2017, Hanukkah reception at the White House, after which guests “shifted” to the Trump International Hotel for a reception hosted by the Republican Jewish Coalition.¹⁸¹ Mr. Gunter’s attendance at the Trump hotel after-party was

¹⁷⁷ U.S. Department of State, Office of the Historian, *Lynda Blanchard* (online at <https://history.state.gov/departmenthistory/people/blanchard-lynda>) (accessed Sept. 10, 2024); *US Ambassador to Leave Slovenia Next Week*, Slovenia Times (Jan. 12, 2021) (online at <https://sloveniatimes.com/22040/us-ambassador-to-leave-slovenia-next-week>); *Opening International Doors: Lynda Blanchard ‘91*, Auburn Alumni Association (Jan. 28, 2021) (online at <https://alumni.auburn.edu/2021/01/28/opening-international-doors-lynda-blanchard-91/>).

¹⁷⁸ MAZARS-OVERSIGHT_COMMITTEE-00019007; MAZARS-OVERSIGHT_COMMITTEE-00028908; MAZARS-OVERSIGHT_COMMITTEE-00029010; MAZARS-OVERSIGHT_COMMITTEE-00029306; MAZARS-OVERSIGHT_COMMITTEE-00030135; MAZARS-OVERSIGHT_COMMITTEE-00030144; MAZARS-OVERSIGHT_COMMITTEE-00030151; MAZARS-OVERSIGHT_COMMITTEE-00030189; MAZARS-OVERSIGHT_COMMITTEE-00030200; MAZARS-OVERSIGHT_COMMITTEE-00030207; MAZARS-OVERSIGHT_COMMITTEE-00030211; MAZARS-OVERSIGHT_COMMITTEE-00030219; MAZARS-OVERSIGHT_COMMITTEE-00030276; MAZARS-OVERSIGHT_COMMITTEE-00030283; MAZARS-OVERSIGHT_COMMITTEE-00030284; MAZARS-OVERSIGHT_COMMITTEE-00030292; MAZARS-OVERSIGHT_COMMITTEE-00030301; MAZARS-OVERSIGHT_COMMITTEE-00030313; MAZARS-OVERSIGHT_COMMITTEE-00030325; MAZARS-OVERSIGHT_COMMITTEE-00030334; MAZARS-OVERSIGHT_COMMITTEE-00030615; MAZARS-OVERSIGHT_COMMITTEE-00030790; MAZARS-OVERSIGHT_COMMITTEE-00030791; MAZARS-OVERSIGHT_COMMITTEE-00030792.

¹⁷⁹ U.S. Department of State, *Jeffrey Ross Gunter* (online at <https://history.state.gov/departmenthistory/people/gunter-jeffrey-ross>) (accessed Aug. 21, 2024); Council of American Ambassadors, *Jeffrey R. Gunter* (accessed on Aug. 13, 2024) (online at www.americanambassadors.org/members/jeffrey-r-gunter); *Controversial US Ambassador Bids “Tremendous” Farewell To Iceland In Deleted Posts*, Reykjavik Grapevine (Jan. 21, 2021) (online at <https://grapevine.is/news/2021/01/21/controversial-us-ambassador-bids-tremendous-farewell-to-iceland-in-deleted-posts/>).

¹⁸⁰ MAZARS-OVERSIGHT_COMMITTEE-00018824; MAZARS-OVERSIGHT_COMMITTEE-00018982; MAZARS-OVERSIGHT_COMMITTEE-00018983; MAZARS-OVERSIGHT_COMMITTEE-00018988; MAZARS-OVERSIGHT_COMMITTEE-00018989.

¹⁸¹ Michael Jansen, *Trump Trumps Himself*, Jordan Times (Dec. 20, 2017) (online at <https://jordantimes.com/opinion/michael-jansen/trump-trumps-himself>); *Tracking Who Is Spending Money at President Trump’s D.C. Hotel*, Washington Post (May 4, 2018) (online at www.washingtonpost.com/graphics/2018/politics/trump-hotel-events/).

confirmed by public reporting.¹⁸² Eight months later, President Trump announced he was nominating Mr. Gunter to be his Ambassador to Iceland.¹⁸³

- **Donald Tapia, U.S. Ambassador to Jamaica (2019–2021):**¹⁸⁴ The records provided by Mazars show that Mr. Tapia stayed at the Trump International Hotel in Washington, D.C., on four nights in August 2018 at a cost of nearly \$1,700.¹⁸⁵
- **Papa Doug Manchester, Nominated as U.S. Ambassador to the Bahamas (2017–2019):**¹⁸⁶ Former President Trump announced his intention to nominate Mr. Manchester to be Ambassador to the Bahamas on May 15, 2017.¹⁸⁷ Following this announcement, Mr. Manchester stayed four nights at the Trump International Hotel in D.C., spending more than \$1,500. He stayed from September 5 to September 7, 2017, and again on April 6, 2018, at which time his nomination was under consideration in the Senate.¹⁸⁸ The Senate failed to act on Mr. Manchester’s nomination in 2018, and his nomination was returned to the President on January 3,

¹⁸² *Daily Kickoff*, Jewish Insider (Dec. 8, 2017) (online at <https://jewishinsider.com/2017/12/daily-kickoff-spotted-trumps-hanukkah-party-congressional-dems-not-ori-allon-raises-450m-softbank-trump-vs-hometown-taxes/>).

¹⁸³ GovInfo, *Digest of Other White House Announcements 2018* (online at www.govinfo.gov/content/pkg/DCPD-2018DIGEST/html/DCPD-2018DIGEST.htm).

¹⁸⁴ U.S. Department of State, Office of the Historian, *Donald R. Tapia* (online at <https://history.state.gov/departmenthistory/people/tapia-donald-r>) (accessed Aug. 22, 2024); US Ambassador N. Nick Perry (@AmbassadorUS_JA), X (Jan. 8, 2021) (online at https://x.com/AmbassadorUS_JA/status/1347552575063777281).

¹⁸⁵ MAZARS-OVERSIGHT_COMMITTEE-00030786; MAZARS-OVERSIGHT_COMMITTEE-00030791; MAZARS-OVERSIGHT_COMMITTEE-00030797; MAZARS-OVERSIGHT_COMMITTEE-00030800.

¹⁸⁶ The White House, *Press Release: President Trump Announces Intent to Nominate Doug Manchester as Ambassador to the Bahamas* (May 15, 2017) (online at <https://trumpwhitehouse.archives.gov/presidential-actions/president-donald-j-trump-announces-intent-nominate-doug-manchester-ambassador-bahamas/>); U.S. Senate, Nomination Doug Manchester, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of The Bahamas (Jan. 3, 2019) (online at www.congress.gov/nomination/115th-congress/1384). This nomination was returned under Rule XXXI, Paragraph 6 of the Standing Rules of the Senate, which means that it was not acted upon before the Senate adjourned. (Congressional Research Services, *Return of Nominations to the President Under Senate Rule XXXI* (Dec. 15, 2023) (online at <https://crsreports.congress.gov/product/pdf/R/R46664>)); U.S. Senate, Received Message of Withdrawal of Nomination from the President of Doug Manchester, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of The Bahamas (Nov. 13, 2019) (online at www.congress.gov/nomination/116th-congress/130).

¹⁸⁷ GovInfo, *Digest of Other White House Announcements 2017* (online at www.govinfo.gov/content/pkg/DCPD-2017DIGEST/html/DCPD-2017DIGEST.htm).

¹⁸⁸ MAZARS-OVERSIGHT_COMMITTEE-00018270; MAZARS-OVERSIGHT_COMMITTEE-00018275; MAZARS-OVERSIGHT_COMMITTEE-00018283; MAZARS-OVERSIGHT_COMMITTEE-00029514.

2019.¹⁸⁹ Mr. Manchester was re-nominated on January 16, 2019.¹⁹⁰ On November 13, 2019, Mr. Manchester's nomination was withdrawn by President Trump after Mr. Manchester was implicated in a pay-to-play scheme in which he promised the Republican National Committee (RNC) a generous donation if the Party Committee would help move his stalled Ambassador nomination through the Senate.¹⁹¹

Judge

In addition to the three federal judges discussed above, Mr. Trump also nominated a practicing attorney, who was not a sitting judge at the time, to a federal judgeship; this soon-to-be-judge stayed at Trump's D.C. hotel before he was confirmed and joined the bench, but *after* his nomination was announced.

- **Judge Eric Tostrud, U.S. District Court for the District of Minnesota (2018–Present):**¹⁹² On February 12, 2018, President Trump announced his intention to nominate Mr. Tostrud, then a practicing attorney, to be a judge on the U.S. District Court for the District of Minnesota.¹⁹³ Like many fellow Trump Administration appointees, Mr. Tostrud elected to stay at the former President's D.C. hotel while he was in town for his confirmation hearing. He stayed from April 8 to April 11, 2018—prior to testifying at his nomination hearing in the Senate Committee on the Judiciary on April 11, 2018, spending

¹⁸⁹ U.S. Senate, Nomination Doug Manchester, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of The Bahamas (Jan. 3, 2019) (online at www.congress.gov/nomination/115th-congress/1384). This nomination was returned under Rule XXXI, Paragraph 6 of the Standing Rules of the Senate, which means that it was not acted upon before the Senate adjourned. (Congressional Research Services, *Return of Nominations to the President Under Senate Rule XXXI* (Dec. 15, 2023) (online at <https://crsreports.congress.gov/product/pdf/R/R46664>)).

¹⁹⁰ U.S. Senate, Nomination of Doug Manchester, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of The Bahamas (Jan. 16, 2019) (online at www.congress.gov/nomination/116th-congress/130).

¹⁹¹ *Possible Pay-to-Play Scheme for Ambassador Role in Trump Administration Uncovered by CBS News*, CBS News (Nov. 9, 2019) (online at www.cbsnews.com/news/doug-manchester-possible-pay-to-play-scheme-for-ambassador-role-in-trump-administration-uncovered/); U.S. Senate, Received Message of Withdrawal of Nomination from the President of Doug Manchester, of California, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Commonwealth of The Bahamas (Nov. 13, 2019) (online at www.congress.gov/nomination/116th-congress/130).

¹⁹² Federal Judicial Center, *Tostrud, Eric Christian* (online at www.fjc.gov/node/5198501) (accessed Sept. 9, 2024).

¹⁹³ GovInfo, *Digest of Other White House Announcements 2018* (online at www.govinfo.gov/content/pkg/DCPD-2018DIGEST/html/DCPD-2018DIGEST.htm); The Federalist Society, *Hon. Eric C. Tostrud* (Oct. 2, 2024) (online at <https://fedsoc.org/contributors/eric-tostrud-3>).

more than \$1,600.¹⁹⁴ Judge Tostrud entered duty on September 14, 2018, and now enjoys lifetime tenure.¹⁹⁵

Other Executive Branch Officials & Board/Commission Members

In addition to the ambassadors and judges already identified, this report profiles four individuals who served in the Trump Administration or were appointed by former President Trump to serve on a federal commission or board and who made thousands of dollars in unethical payments to former President Trump’s D.C. hotel. These include:

- **Kellyanne Conway, Assistant and Senior Counselor to the President (January 2017–August 2020):**¹⁹⁶ Although the Committee does not have a complete record of the guests who stayed at the Trump hotel around the time of President Trump’s inauguration, a record of “group accounts” provided by Mazars reflects that Ms. Conway stayed at the Trump International Hotel in Washington, D.C., on January 18, 2017—just before Mr. Trump’s inauguration, racking up more than \$17,000 in charges.¹⁹⁷ Ms. Conway—who “repeatedly violated” the Hatch Act and “scoffed at” and “ridiculed” its requirements that federal officials avoid using their positions to engage in political activity—had also lived in Trump World Tower in New York City.¹⁹⁸

¹⁹⁴ MAZARS-OVERSIGHT_COMMITTEE-00029529; MAZARS-OVERSIGHT_COMMITTEE-00029538; MAZARS-OVERSIGHT_COMMITTEE-00029548; MAZARS-OVERSIGHT_COMMITTEE-00029559; Senate Committee on the Judiciary, *Nominations Hearing* (Apr. 11, 2018) (online at www.judiciary.senate.gov/committee-activity/hearings/04/11/2018/nominations-1).

¹⁹⁵ Federal Judicial Center, *Tostrud, Eric Christian* (online at www.fjc.gov/node/5198501) (accessed Sept. 9, 2024); Email from Congressional Research Services to Committee on Oversight and Accountability, Minority Staff (Sept. 16, 2024).

¹⁹⁶ Office of Government Ethics, *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Kellyanne Conway) (filed Mar. 13, 2017) (online at <https://altgov2.org/wp-content/uploads/2022/05/Conway-Kellyanne-finalNE278.pdf>); Executive Office of the President, *Annual Report to Congress on White House Office Personnel* (July 1, 2017) (online at <https://trumpwhitehouse.archives.gov/sites/whitehouse.gov/files/docs/disclosures/07012017-report-final.pdf>); *Kellyanne Conway to Leave the White House at the End of the Month, Citing the Need to Focus on Her Family*, Washington Post (Aug. 23, 2020) (online at www.washingtonpost.com/politics/kellyanne-conway-white-house/2020/08/23/6c26e18a-e5a7-11ea-bc79-834454439a44_story.html).

¹⁹⁷ MAZARS-OVERSIGHT_COMMITTEE-00010205 (showing guest ledgers for group accounts); *What We Know About Trump’s Inauguration So Far*, Washington Post (Jan. 6, 2017) (online at www.washingtonpost.com/lifestyle/style/what-we-know-about-trumps-inauguration-so-far/2017/01/06/6bb05fb0-d435-11e6-9cb0-54ab630851e8_story.html).

¹⁹⁸ *10 Things You Didn’t Know About Kellyanne Conway*, U.S. News & World Report (Mar. 9, 2017) (online at www.usnews.com/news/national-news/articles/2017-03-09/10-things-you-didnt-know-about-kellyanne-conway); Office of Special Counsel, *Report of Prohibited Political Activity Under the Hatch Act OSC File Nos. HA-19-0631 & HA-19-3395 (Kellyanne Conway)* (May 30, 2019) (online at [https://osc.gov/Documents/Hatch%20Act/Reports/Report%20of%20Prohibited%20Political%20Activity,%20Kellyanne%20Conway%20\(HA-19-0631%20%26%20HA-19-3395\).pdf](https://osc.gov/Documents/Hatch%20Act/Reports/Report%20of%20Prohibited%20Political%20Activity,%20Kellyanne%20Conway%20(HA-19-0631%20%26%20HA-19-3395).pdf)).

- **Larry Kudlow, Director of the National Economic Council (2018–2021):**¹⁹⁹ Mr. Kudlow stayed at the Trump International Hotel in D.C. on October 12, 2017, spending \$1,440.²⁰⁰ That day, he interviewed Commerce Secretary Wilbur Ross at an event held with Alphabet Inc.’s Google unit at Google’s Washington, D.C., office.²⁰¹ The event was sponsored by Google and *Newsmax*.²⁰² Less than six months later, President Trump appointed him as Director of the National Economic Council at the White House.
- **Brian Ballard, Member, Board of Trustees of the John F. Kennedy Center for the Performing Arts (2020):**²⁰³ An RNC finance vice chair and Trump super-donor who built a lobbying firm around his personal connections to President Trump, Brian Ballard was appointed by the former President to the Board of Trustees of the John F. Kennedy Center for the Performing Arts.²⁰⁴ The limited records available to the Committee show that Mr. Ballard—who was described as “closer to the president than perhaps any other lobbyist”—spent lavishly at former President Trump’s D.C. hotel, renting 37 rooms for various stays between September 2017 and April 2018, spending more than \$21,000.²⁰⁵

¹⁹⁹ *Larry Kudlow to Replace Gary Cohn as Trump’s Top Economic Advisor*, CNBC (Mar. 14, 2018) (online at www.cnbc.com/2018/03/14/trump-to-name-larry-kudlow-as-gary-cohn-replacement.html); Office of Government Ethics, *Executive Branch Personnel Public Financial Disclosure Report* (OGE Form 278e) (Lawrence A. Kudlow) (filed May 15, 2018) (online at https://ia801003.us.archive.org/16/items/kudlow-initial-disclosure/KUDLOW%2C%20LAWRENCE_New%20Entrant%20Report_Pending%20Certification.pdf); *Former Trump Adviser Larry Kudlow Lands at Fox News*, Hollywood Reporter (Jan. 26, 2021) (online at www.hollywoodreporter.com/tv/tv-news/former-trump-adviser-larry-kudlow-lands-at-fox-news-4122077/).

²⁰⁰ MAZARS-OVERSIGHT_COMMITTEE-00018560.

²⁰¹ *Google to Co-Host Wilbur Ross Talk with News Site Newsmax*, Reuters (Oct. 11, 2017) (online at www.reuters.com/article/economy/google-to-co-host-wilbur-ross-talk-with-news-site-newsmax-idUSKBN1CG2RB/).

²⁰² *Wilbur Ross to Newsmax TV: Congress ‘More Concerned About Procedure Than Results,’* Newsmax (Oct. 12, 2017) (online www.newsmax.com/Newsmax-Tv/commerce-secretary-wilbur-ross-congress/2017/10/12/id/819395/).

²⁰³ The White House, *Press Release: President Donald J. Trump Announces Intent to Appoint the Following Individuals to Key Administration Posts* (Dec 3, 2020) (online at <https://trumpwhitehouse.archives.gov/presidential-actions/president-donald-j-trump-announces-intent-appoint-following-individuals-key-administration-posts-120320/>).

²⁰⁴ *Id.*; Ballard Partners, *Brian D. Ballard* (online at <https://ballardpartners.com/the-team/brian-d-ballard/>); Center for Public Integrity, *Florida Lobbyist Turning Trump Ties into Mega-Millions* (July 5, 2017) (online at <https://publicintegrity.org/politics/florida-lobbyist-turning-trump-ties-into-mega-millions/>); *The Most Powerful Lobbyist in Trump’s Washington*, Politico (Apr. 2, 2018) (online at www.politico.com/magazine/story/2018/04/02/most-powerful-lobbyist-in-trump-washington-217759).

²⁰⁵ MAZARS-OVERSIGHT_COMMITTEE-00018306; MAZARS-OVERSIGHT_COMMITTEE-00018315; MAZARS-OVERSIGHT_COMMITTEE-00018324; MAZARS-OVERSIGHT_COMMITTEE-00018333; MAZARS-OVERSIGHT_COMMITTEE-00018343; MAZARS-OVERSIGHT_COMMITTEE-00018545; MAZARS-OVERSIGHT_COMMITTEE-00018556; MAZARS-OVERSIGHT_COMMITTEE-00018585; MAZARS-OVERSIGHT_COMMITTEE-00018756; MAZARS-OVERSIGHT_COMMITTEE-00018766; MAZARS-OVERSIGHT_COMMITTEE-00018784; MAZARS-OVERSIGHT_COMMITTEE-00018899; MAZARS-OVERSIGHT_COMMITTEE-00018900; MAZARS-OVERSIGHT_COMMITTEE-00018922; MAZARS-OVERSIGHT_COMMITTEE-00018926; MAZARS-OVERSIGHT_COMMITTEE-00019041; MAZARS-OVERSIGHT_COMMITTEE-00019043; MAZARS-OVERSIGHT_COMMITTEE-00019044; MAZARS-OVERSIGHT_COMMITTEE-00019046; MAZARS-OVERSIGHT_COMMITTEE-00019157; MAZARS-OVERSIGHT_COMMITTEE-00019165; MAZARS-OVERSIGHT_COMMITTEE-

Mr. Ballard was also a frequent patron of Mr. Trump’s Mar-a-Lago Club, reportedly having joined Mar-a-Lago midway through Mr. Trump’s term after Mr. Trump noticed that he was not a member.²⁰⁶ Shortly before the end of Mr. Trump’s presidency, Mr. Ballard received yet another favor from former President Trump—a pardon for Mr. Ballard’s sister, Mary Ballard McCarty, who had been convicted of fraud, which she committed while serving as a County Commissioner for Palm Beach County, Florida.²⁰⁷

- **Johnnie Moore, Member, United States Commission on International Religious Freedom (2018–2021):**²⁰⁸ The limited room records available to the Committee reveal that Mr. Moore stayed at the Trump hotel in November 2017 and January 2018; his stays totaled four nights and cost more than \$5,000.²⁰⁹ Beyond the stays identified in Mazars records, Mr. Moore was reportedly a frequent patron of the Trump International Hotel in D.C., which reportedly “serve[d] as an unofficial office for him during his frequent trips to the District.”²¹⁰

Pardon Recipients

The records produced to the Committee by Mazars show that at least five people who received pardons from President Trump stayed at his D.C. hotel in 2017 and 2018, spending more than \$21,000. None of the pardon recipients held federal or state positions while former President Trump was in office. However, these expenditures are particularly troubling in light of allegations that former President Trump’s former personal attorney, Rudy Giuliani, was involved

00019207; MAZARS-OVERSIGHT_COMMITTEE-00019214; MAZARS-OVERSIGHT_COMMITTEE-00019251; MAZARS-OVERSIGHT_COMMITTEE-00019256; MAZARS-OVERSIGHT_COMMITTEE-00016581; MAZARS-OVERSIGHT_COMMITTEE-00016591; MAZARS-OVERSIGHT_COMMITTEE-00016600; MAZARS-OVERSIGHT_COMMITTEE-00016606; MAZARS-OVERSIGHT_COMMITTEE-00016613; MAZARS-OVERSIGHT_COMMITTEE-00016656; MAZARS-OVERSIGHT_COMMITTEE-00016668; MAZARS-OVERSIGHT_COMMITTEE-00016777; MAZARS-OVERSIGHT_COMMITTEE-00016783; MAZARS-OVERSIGHT_COMMITTEE-00016895; MAZARS-OVERSIGHT_COMMITTEE-00016906; MAZARS-OVERSIGHT_COMMITTEE-00016917; MAZARS-OVERSIGHT_COMMITTEE-00017106; *The Most Powerful Lobbyist in Trump’s Washington*, Politico, (Apr. 2, 2018) (online at www.politico.com/magazine/story/2018/04/02/most-powerful-lobbyist-in-trump-washington-217759).

²⁰⁶ *The Swamp That Trump Built*, New York Times (Oct. 10, 2020) (online at www.nytimes.com/interactive/2020/10/10/us/trump-properties-swamp.html).

²⁰⁷ *Latest Pardon Supporter List is Yet Another Who’s Who of Trump Influencers*, Talking Points Memo (Dec. 24, 2020) (online at <https://talkingpointsmemo.com/news/latest-pardon-supporter-list-is-yet-another-whos-who-of-trump-influencers>); Donald J. Trump, President, *Executive Grant of Clemency* (Dec. 23, 2020) (online at www.justice.gov/pardon/file/1112491/dl?inline).

²⁰⁸ United States Commission on International Religious Freedom, *Former Commissioners* (online at www.uscirf.gov/about-uscirf/former-commissioners) (accessed Aug. 22, 2024).

²⁰⁹ MAZARS-OVERSIGHT_COMMITTEE-00018857; MAZARS-OVERSIGHT_COMMITTEE-00018881; MAZARS-OVERSIGHT_COMMITTEE-00018890; MAZARS-OVERSIGHT_COMMITTEE-00028903.

²¹⁰ *With Pence’s Jerusalem Embassy News, Trump’s Evangelical Advisers Tick an Item off the List*, Washington Post (Jan. 22, 2018) (online at www.washingtonpost.com/news/acts-of-faith/wp/2018/01/08/walking-a-line-the-shrewd-tactics-of-the-white-houses-evangelical-gatekeeper/).

in efforts to sell presidential pardons for \$2 million apiece—an amount Mr. Giuliani reportedly planned to split with President Trump.²¹¹

- **Elliott Broidy:** As discussed earlier, Elliott Broidy, a “top Republican fundraiser,” spent \$15,000 on stays at former President Trump’s D.C. hotel in the fall and winter of 2017 and in early 2018.²¹² During the Trump Administration, Mr. Broidy violated the Foreign Agents Registration Act for his un-registered lobbying to try to persuade the Administration to drop the DOJ’s prosecutions regarding Malaysia’s IMDB sovereign wealth fund—a massive corruption case involving the former Prime Minister of Malaysia—and “to deport a critic of the Chinese Communist Party.”²¹³ As previously discussed, one of his stays at the hotel overlapped with that of the Malaysian Prime Minister. In addition, Mr. Broidy also stayed at the President’s hotel on October 6, 2017—the same day he reportedly lobbied President Trump on behalf of the United Arab Emirates (U.A.E.).²¹⁴ Public reporting indicates that Mr. Broidy met with then-President Trump at the White House that day, advocating among other priorities, that he fire then-Secretary of State Rex Tillerson.²¹⁵ Mr. Broidy pled guilty to conspiring to violate

²¹¹ *Giuliani Accused of Offering to Sell Trump Pardons for \$2 Million Each in New LawsUIT*, NBC News (May 15, 2023) (online at www.nbcnews.com/politics/politics-news/giuliani-accused-offering-sell-trump-pardons-2-million-new-lawsuit-rcna84569).

²¹² MAZARS-OVERSIGHT_COMMITTEE-00018267; MAZARS-OVERSIGHT_COMMITTEE-00018270; MAZARS-OVERSIGHT_COMMITTEE-00018305; MAZARS-OVERSIGHT_COMMITTEE-00018314; MAZARS-OVERSIGHT_COMMITTEE-00018323; MAZARS-OVERSIGHT_COMMITTEE-00018332; MAZARS-OVERSIGHT_COMMITTEE-00018356; MAZARS-OVERSIGHT_COMMITTEE-00018360; MAZARS-OVERSIGHT_COMMITTEE-00018366; MAZARS-OVERSIGHT_COMMITTEE-00018422; MAZARS-OVERSIGHT_COMMITTEE-00018430; MAZARS-OVERSIGHT_COMMITTEE-00018457; MAZARS-OVERSIGHT_COMMITTEE-00018466; MAZARS-OVERSIGHT_COMMITTEE-00018478; MAZARS-OVERSIGHT_COMMITTEE-00018487; MAZARS-OVERSIGHT_COMMITTEE-00018494; MAZARS-OVERSIGHT_COMMITTEE-00018501; MAZARS-OVERSIGHT_COMMITTEE-00018642; MAZARS-OVERSIGHT_COMMITTEE-00018643; MAZARS-OVERSIGHT_COMMITTEE-00018649; MAZARS-OVERSIGHT_COMMITTEE-00018657; MAZARS-OVERSIGHT_COMMITTEE-00018697; MAZARS-OVERSIGHT_COMMITTEE-00018984; MAZARS-OVERSIGHT_COMMITTEE-00018989; MAZARS-OVERSIGHT_COMMITTEE-00018994; MAZARS-OVERSIGHT_COMMITTEE-00028922; MAZARS-OVERSIGHT_COMMITTEE-00019345; MAZARS-OVERSIGHT_COMMITTEE-00019350; MAZARS-OVERSIGHT_COMMITTEE-00019361; MAZARS-OVERSIGHT_COMMITTEE-00019373; *Trump Pardons Former GOP Fundraiser Elliott Broidy*, Axios (Jan. 20, 2021) (online at www.axios.com/2021/01/20/trump-elliott-broidy-pardon).

²¹³ U.S. Department of Justice, *Press Release: Elliott Broidy Pleads Guilty for Back-Channel Lobbying Campaign to Drop IMDB Investigation and Remove a Chinese Foreign National* (Oct. 20, 2020) (online at www.justice.gov/opa/pr/elliott-broidy-pleads-guilty-back-channel-lobbying-campaign-drop-1mdb-investigation-and).

²¹⁴ *Mueller’s Focus on Adviser to Emirates Suggests Broader Investigation*, New York Times (Mar. 3, 2018) (online at www.nytimes.com/2018/03/03/us/politics/george-nader-mueller-investigation-united-arab-emirates.html); U.S. Department of Justice, *Press Release: Elliott Broidy Pleads Guilty for Back-Channel Lobbying Campaign to Drop IMDB Investigation and Remove a Chinese Foreign National* (Oct. 20, 2020) (online at www.justice.gov/opa/pr/elliott-broidy-pleads-guilty-back-channel-lobbying-campaign-drop-1mdb-investigation-and).

²¹⁵ *How 2 Gulf Monarchies Sought to Influence the White House*, New York Times (Mar. 21, 2018) (online at www.nytimes.com/2018/03/21/us/politics/george-nader-elliott-broidy-uae-saudi-arabia-white-house-influence.html).

foreign lobbying laws on October 20, 2020, and subsequently received a pardon from former President Trump.²¹⁶

- **Ken Kurson:** On the night of December 7, 2017, Ken Kurson, a family friend of Jared Kushner and former speechwriter for Rudy Giuliani, stayed at former President Trump’s D.C. hotel.²¹⁷ The Trump Administration briefly considered Mr. Kurson for a “prestigious” board position on the National Endowment for the Humanities (NEH) in 2018.²¹⁸ In a peculiar twist, it was the troubling revelations uncovered in Mr. Kurson’s government background check for the prospective NEH position that led to his criminal charges in the first place. In the course of vetting Mr. Kurson, who withdrew from consideration not long after his background check began, Federal Bureau of Investigation (FBI) agents found for the first time evidence that Mr. Kurson had stalked and harassed his ex-wife and two others around the time his marriage was collapsing in 2015.²¹⁹ In October 2020, the FBI arrested Mr. Kurson on federal cyberstalking charges.²²⁰ President Trump pardoned Mr. Kurson on January 19, 2021—before his case was set to go to trial.²²¹ In August 2021, Mr. Kurson was re-arrested on *state* charges of cyberstalking his ex-wife and ultimately entered a guilty plea to two misdemeanor counts for surreptitiously installing spyware on his ex-wife’s computer.²²² In February 2023, he

²¹⁶ U.S. Department of Justice, *Press Release: Elliott Brody Pleads Guilty for Back-Channel Lobbying Campaign to Drop IMDB Investigation and Remove a Chinese Foreign National* (Oct. 20, 2020) (online at www.justice.gov/opa/pr/elliott-brody-pleads-guilty-back-channel-lobbying-campaign-drop-1mdb-investigation-and); *Trump Pardons Former GOP Fundraiser Elliott Brody*, Axios (Jan. 20, 2021) (online at www.axios.com/2021/01/20/trump-elliott-brody-pardon); Donald J. Trump, President, *Executive Grant of Clemency* (Jan. 19, 2021) (online at www.justice.gov/pardon/file/1117706/dl?inline).

²¹⁷ MAZARS-OVERSIGHT_COMMITTEE-00018983.

²¹⁸ *A Kushner Ally Was up for a Federal Post. Then the F.B.I. Began Digging.*, New York Times (July 26, 2018) (online at www.nytimes.com/2018/07/26/business/ken-kurson-jared-kushner.html); *Trump Family Friend Ken Kurson, Pardoned by Trump, Pleads Guilty to Cyberstalking*, ABC News (Feb. 16, 2022) (online at <https://abcnews.go.com/Politics/trump-family-friend-ken-kurson-pardoned-trump-pleads/story?id=82931684>); Donald J. Trump, President, *Executive Grant of Clemency* (Jan. 19, 2021) (online at www.justice.gov/pardon/file/1117706/dl?inline).

²¹⁹ *A Kushner Ally Was up for a Federal Post. Then the F.B.I. Began Digging.*, New York Times (July 26, 2018) (online at www.nytimes.com/2018/07/26/business/ken-kurson-jared-kushner.html); U.S. Attorney’s Office, Eastern District of New York, *Press Release: Individual Charged with Cyberstalking Three Victims* (Oct. 23, 2020) (online at www.justice.gov/usao-edny/pr/individual-charged-cyberstalking-three-victims).

²²⁰ U.S. Attorney’s Office, Eastern District of New York, *Press Release: Defendant Kenneth Kurson’s Alleged Harassment of His Victims Involved Repeated Visits to Their Workplace, Filing False Complaints with Their Employer and Malicious Cyber Activity* (Oct. 23, 2020) (online at www.justice.gov/usao-edny/pr/individual-charged-cyberstalking-three-victims).

²²¹ *In One of His Final Acts, Trump Showered Clemency on People with Connections to Him and His Allies*, Washington Post (Jan. 20, 2021) (online at www.washingtonpost.com/politics/trump-pardons/2021/01/20/dfc79216-5b49-11eb-8bcf-3877871c819d_story.html); Donald J. Trump, President, *Executive Grant of Clemency* (Jan. 19, 2021) (online at www.justice.gov/pardon/file/1117706/dl?inline).

²²² *Trump Family Friend Ken Kurson, Pardoned by Trump, Pleads Guilty to Cyberstalking*, ABC News (Feb. 16, 2022) (online at <https://abcnews.go.com/Politics/trump-family-friend-ken-kurson-pardoned-trump-pleads/story?id=82931684>).

fulfilled the terms of his plea deal for his state charges, which involved completing 100 hours of community service, among other terms.²²³

- **Dinesh D’Souza:** Former President Trump pardoned Dinesh D’Souza on May 31, 2018.²²⁴ Mr. D’Souza pled guilty to federal campaign finance law violations for his use of straw donors in 2012 to back a Republican Senate candidate in New York and had been sentenced to five years’ probation and a \$30,000 fine.²²⁵ The limited set of records available to the Committee reveal that, shortly after he was pardoned, Mr. D’Souza stayed at former President Trump’s D.C. hotel on August 1–3, 2018, contemporaneous with an August 2, 2018, red carpet screening of his film, *Death of a Nation: Plantation Politics and the Making of the Democratic Party*—an event co-hosted by Donald Trump Jr.—spending more than \$3,000.²²⁶ Mr. D’Souza’s daughter, Danielle D’Souza Gill, also stayed at the hotel at the same time.²²⁷ Notably, despite the Trump White House’s refusal to release visitor logs, there is evidence that both Mr. D’Souza and his daughter, on separate occasions, visited the White House during the Trump Administration. *Newsweek* reported that in August 2017, shortly after Mr. D’Souza published his new book, *The Big Lie: Exposing the Nazi Roots of the American Left*, he visited the White House to meet with “two of the most far-right members of the West Wing: senior political strategist Stephen K. Bannon and Sebastian Gorka, an anti-terrorism expert of questionable credentials.”²²⁸ The Committee did not receive room records from Mazars covering August 2017; as such, the Committee does not know if he stayed at the Trump International Hotel in Washington, D.C., at that time. Further, in November 2019—another month for which the Committee lacks room records—Danielle D’Souza Gill

²²³ *Ex-New York Observer Editor Ken Kurson Admits to Harassing Ex-Wife*, New York Post (Feb. 16, 2023) (online at <https://nypost.com/2023/02/16/ex-ny-observer-editor-ken-kurson-sentenced-under-plea-deal/>).

²²⁴ *Here’s a Reminder of Some of Dinesh D’Souza’s Inflammatory Comments*, Washington Post (May 31, 2018) (online at www.washingtonpost.com/news/the-fix/wp/2018/05/31/heres-a-reminder-of-some-of-dinesh-dsouzas-inflammatory-comments/); Donald J. Trump, President, *Executive Grant of Clemency* (May 31, 2018) (online at www.justice.gov/pardon/page/file/1067776/dl?inline).

²²⁵ *Here’s a Reminder of Some of Dinesh D’Souza’s Inflammatory Comments*, Washington Post (May 31, 2018) (online at www.washingtonpost.com/news/the-fix/wp/2018/05/31/heres-a-reminder-of-some-of-dinesh-dsouzas-inflammatory-comments/).

²²⁶ MAZARS-OVERSIGHT_COMMITTEE-00030613; MAZARS-OVERSIGHT_COMMITTEE-00030615; MAZARS-OVERSIGHT_COMMITTEE-00030621; MAZARS-OVERSIGHT_COMMITTEE-00030624; MAZARS-OVERSIGHT_COMMITTEE-00030625; MAZARS-OVERSIGHT_COMMITTEE-00030630; MAZARS-OVERSIGHT_COMMITTEE-00030634; *Prominent Conservatives Attend Screening of New D’Souza Film*, One America News (Aug. 2, 2018) (online at www.youtube.com/watch?v=xluogiVy33o&t=139s); *Donald Trump Jr. Co-Hosts Dinesh D’Souza’s Very Conservative D.C. Film Premiere*, Washington Post (Aug. 2, 2018) (online at www.washingtonpost.com/news/reliable-source/wp/2018/08/02/donald-trump-jr-co-hosts-dinesh-dsouzas-very-conservative-d-c-film-premiere/).

²²⁷ MAZARS-OVERSIGHT_COMMITTEE-00030615; MAZARS-OVERSIGHT_COMMITTEE-00030624.

²²⁸ *Right-Wing Pundit Dinesh D’Souza Visits Bannon and Gorka in White House to Tout New Book Comparing Liberals to Nazis*, *Newsweek* (updated Aug. 5, 2017) (online at www.newsweek.com/dinesh-dsouza-visits-steve-bannon-and-sebastian-gorka-white-house-646816).

shared a photo of herself and her husband, Brandon Gill, on the White House grounds.²²⁹ In 2022, Mr. Gill worked with Dinesh D’Souza, his father-in-law, on *2,000 Mules*, a debunked documentary that pushed the false narrative that the 2020 election was stolen from Mr. Trump.²³⁰ As of this writing, Mr. Gill is the Republican nominee for the U.S. House of Representatives seat in Texas’s 26th Congressional District. Former President Trump’s endorsement reportedly helped Mr. Gill win the primary, and Mr. Gill has promised to be a champion for Mr. Trump if he is elected to Congress.²³¹

- **James Kassouf:** Mr. Kassouf, a real estate investor, pled guilty to one count of filing a false tax return in 1999.²³² He received a pardon from former President Donald Trump on December 23, 2020.²³³ According to the limited records available to the Committee, Mr. Kassouf stayed at former President Trump’s D.C. hotel on September 25, 2017, and again on March 7, 2018, spending more than \$850 for the two stays.²³⁴ In August 2020, only months before former President Trump pardoned him, Mr. Kassouf helped coordinate an Ohio fundraiser for Trump’s 2020 presidential campaign.²³⁵
- **Albert Pirro:** Albert Pirro, the ex-husband of *FOX News* host Jeanine Pirro, stayed at Mr. Trump’s D.C. hotel for at least four nights in 2018, spending more than \$2,000.²³⁶ On his final day in office, Mr. Trump granted Mr. Pirro, a real-estate lawyer whom Mr.

²²⁹ Danielle D’Souza, (@danielledsouzagill), Instagram (Nov. 6, 2019) (online at www.instagram.com/danielledsouzagill/p/B4iODHpgMpx/?img_index=1).

²³⁰ *Political Novice Brandon Gill Seeks to be Trump’s Biggest Advocate in Congress*, Texas Tribune (Mar. 13, 2024) (online at www.texastribune.org/2024/03/13/texas-congressional-district-26-brandon-gill/); *A Belated Apology for “2,000 Mules,”* Wall Street Journal (June 5, 2024) (online at www.wsj.com/articles/2000-mules-salem-media-lawsuit-mark-andrews-dinesh-dsouza-2020-election-true-the-vote-1565ace0).

²³¹ *Id.*

²³² *President Trump Pardons Cleveland Real Estate Mogul James Kassouf, a Co-Host of Trump’s Bratenahl Fundraiser in August*, NBC-WKYC (Dec. 24, 2020) (online at www.wkyc.com/article/news/local/cleveland/president-trump-pardons-cleveland-real-estate-mogul-james-kassouf-a-co-host-of-trumps-bratenahl-fundraiser-in-august/95-55cdbb81-1e63-4268-956f-42e25f6742bf).

²³³ Donald J. Trump, President, *Executive Grant of Clemency* (Dec. 23, 2020) (online at www.justice.gov/pardon/file/1112481/dl?inline=).

²³⁴ MAZARS-OVERSIGHT_COMMITTEE-00016600; MAZARS-OVERSIGHT_COMMITTEE-00018393.

²³⁵ *President Trump Pardons Cleveland Real Estate Mogul James Kassouf, a Co-Host of Trump’s Bratenahl Fundraiser in August*, NBC-WKYC (Dec. 24, 2020) (online at www.wkyc.com/article/news/local/cleveland/president-trump-pardons-cleveland-real-estate-mogul-james-kassouf-a-co-host-of-trumps-bratenahl-fundraiser-in-august/95-55cdbb81-1e63-4268-956f-42e25f6742bf).

²³⁶ MAZARS-OVERSIGHT_COMMITTEE-00019247; MAZARS-OVERSIGHT_COMMITTEE-00016596; MAZARS-OVERSIGHT_COMMITTEE-00016665; MAZARS-OVERSIGHT_COMMITTEE-00016874; *Trump Issues Last-Minute Pardon to Albert Pirro, Ex-Husband of Jeanine Pirro*, Politico (Jan. 20, 2020) (online at www.politico.com/news/2021/01/20/trump-last-minute-pardon-albert-pirro-460764).

Trump had previously kept on retainer, a pardon for his 2000 conviction on federal conspiracy and tax evasion charges.²³⁷

²³⁷ Donald J. Trump, President, *Executive Grant of Clemency* (Jan. 20, 2021) (online at www.justice.gov/pardon/file/1118161/dl?inline); *Trump Issues Last-Minute Pardon to Albert Pirro, Ex-Husband of Jeanine Pirro*, Politico (Jan. 20, 2020) (online at www.politico.com/news/2021/01/20/trump-last-minute-pardon-albert-pirro-460764); *Pirro Mania*, New York Magazine (May 10, 1999) (online at <https://nymag.com/nymetro/news/politics/newyork/features/862/>).

CONCLUSION

Together with a prior report released in January 2024, this Democratic staff report documents how former President Trump treated the presidency as a money-making opportunity, selling policy favors to foreign dictators, government jobs to office-seekers, and presidential pardons to criminals—all while extracting unlawful domestic emoluments from the U.S. Secret Service, and likely from federal and state officials, at taxpayer expense. In particular, this report highlights how a glimpse through a narrow window—11 months of records from a single Trump-owned hotel—is enough to identify more than \$300,000 in payments he accepted that raise the appearance of corruption and pay-to-play. These payments came from state officials and one state legislature, individuals who held federal jobs in his administration or were nominated by him to be federal judges, and individuals who sought and received clemency for criminal convictions, as well as the U.S. Secret Service. More than half of these payments totaling nearly \$175,000 may have directly violated—or, in the case of Secret Service expenditures, definitely violated—the Constitution’s prohibition against a president’s receipt of domestic emoluments. All of these payments created the appearance of the very kind of pay-to-play and influence-trafficking schemes that the Framers and two-and-a-half centuries of anti-corruption legislation have sought to eradicate.

As soon as he took the gavel, Chairman Comer, working with Mr. Trump’s attorneys, blocked the Committee from receiving additional evidence of the constitutionally prohibited payments former President Trump received. In the absence, therefore, of records covering all of former President Trump’s properties and all four years of his presidency, these two reports are far from a comprehensive accounting of Donald Trump’s success in using the more than 500 corporations, limited liability companies, trusts, and other entities he chose to carry into the presidency as avenues through which he could receive unconstitutional, illegal, and corrupt payments. Nonetheless, these two reports irrefutably demonstrate that, as Commander-in-Chief, Donald Trump routinely violated his oath of office by putting his financial self-interest far above the public interest, which never seems to make an appearance in these shakedown transactions.

Far from expressing contrition for cashing in on the presidency, as a candidate, Donald Trump has announced his intention to expand his monetization of the federal government if re-elected. In particular, he has promised to gut the federal civil service and replace professional, expert, nonpolitical federal employees with a cadre of sycophants and loyalists. Specifically, he has proposed implementing an expansive new category of political appointments under what the former Trump Administration called “Schedule F.” Not only would implementation of Schedule F create a whole new army of useless yes-men within the government, but it would also significantly expand the universe of individuals incentivized to spend money at Trump properties to curry favor with Donald Trump and support their bids to obtain and retain jobs in his administration.

The findings of these Democratic staff reports reveal significant shortcomings in the current federal anti-corruption framework—shortcomings that Donald Trump exploited to the tune of millions of dollars and intends to exploit again if he is returned to the Oval Office. As such, these reports are urgent calls to action that Congress must heed to ensure the effective enforcement of the Constitution’s Domestic Emoluments Clause—as well as the Foreign

Emoluments Clause—and to ensure that our government serves exclusively the public interests of the people rather than the private interests of the president.