

ONE HUNDRED NINETEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON THE JUDICIARY

2138 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6216

(202) 225-6906
judiciary.house.gov

MEMORANDUM

September 16, 2025

To: Democratic Members of the Committee on the Judiciary

Fr: Ranking Member Raskin and Democratic Committee Staff

Re: Epstein is the Tip of the Iceberg: The Trump Administration is Dismantling the Anti-Human Trafficking Infrastructure and Coddling Human Traffickers, Sexual Predators, and Rapists

President Donald J. Trump began his second term promising to “make America safe again.” But safe for whom? Law-abiding citizens or dangerous criminals?

On the first day of his administration, President Trump granted pardons to nearly 1,600 felons who violently assaulted hundreds of police officers on the steps of the United States Capitol and conspired to overthrow the 2020 presidential election.¹ At the same time, President Trump fired dozens of veteran federal prosecutors in the Department of Justice (DOJ) for having prosecuted the Proud Boys, Oath Keepers, and other members of his rampaging, seditious mob.² They were sacked simply for doing their jobs and doing them well.

Many hoped that President Trump’s shocking endorsement of violent criminals and mistreatment of law enforcement simply reflected the President’s personal debt of gratitude to the participants in the January 6th insurrection. Perhaps his sweeping embrace of criminal violence would be a one-off act of appreciation for the mob that stormed the Capitol in his name.

But, over the last seven months, the Trump Administration has aggressively extended clemency and protection to corrupt politicians of both parties,³ well-connected white-collar

¹ Tom Dreisbach, *Criminal records of Jan. 6 rioters pardoned by Trump include rape, domestic violence*, NPR (Jan. 30, 2025), <https://www.npr.org/2025/01/30/nx-s1-5276336/donald-trump-jan-6-rape-assault-pardons-rioters>.

² Glenn Thrush, et al., *More Than a Dozen Prosecutors at Washington U.S. Attorney’s Office Are Dismissed*, N.Y. TIMES (Jan. 31, 2025), <https://www.nytimes.com/2025/01/31/us/politics/prosecutors-us-attorneys-office-trump-firings.html>.

³ Esther Eriksson von Allmen & Miru Osuga, *Trump has granted clemency to 16 corrupt politicians—so far*, CREW (June 2, 2025), <https://www.citizensforethics.org/reports-investigations/crew-investigations/trump-has-granted-clemency-to-16-corrupt-politicians-so-far/>.

criminals,⁴ crypto felons and fraudsters,⁵ and the group that is the focus of this memo: human traffickers, pimps, violators of women and children, rapists, and sexual assailants.

We believe the Trump Administration's official structural tilt in favor of these criminals will scandalize the American public when its full extent is understood.

As President Trump and his supporters have gone from demanding the release of the Jeffrey Epstein files to doing everything in their power to *prevent* their release, openly tampering with potential witness Ghislaine Maxwell⁶ and calling the matter a "Democrat hoax,"⁷ Americans across the political spectrum are appalled by the President's dramatic reversal of position.⁸ The public overwhelmingly favors complete transparency and accountability for everyone who participated in the trafficking of underage girls for the pleasure of the rich and powerful.⁹

But it is clear now that the Trump Administration's sympathetic alignment with powerful sex traffickers and rapists goes far beyond its efforts to suppress the truth of what happened in one explosive case. House Judiciary Committee Democrats have found that:

- In the past seven months, President Trump has gutted federal offices designed to combat human trafficking, domestic violence, and sexual violence against women and children.
- President Trump has similarly terminated the programs and grants designed to support the victims and survivors of human trafficking networks and crimes of sexual violence.
- President Trump has made it systematically harder for law enforcement to prosecute sex offenders and dismantle sex trafficking networks.

⁴ Dan Primack, *Trump pardons a bunch of white-collar crooks*, AXIOS (Mar. 31, 2025), <https://www.axios.com/2025/03/31/trump-pardons-bitmex-crypto-fraud>.

⁵ Peter Stone, *"I have never seen such corruption": Trump's crypto deals and loosening of rules shock observers*, THE GUARDIAN (June 17, 2025), <https://www.theguardian.com/us-news/2025/jun/17/trump-crypto-memecoin-corruption>.

⁶ Letter from Ranking Member Jamie Raskin, H. Comm. on the Judiciary, et al., to U.S. Atty. General Pamela J. Bondi, U.S. Dept. of Justice, and Dir. William K. Marshall III, Fed. Bureau of Investigations (Aug. 12, 2025), <https://democrats-judiciary.house.gov/sites/evo-subsites/democrats-judiciary.house.gov/files/evo-media-document/2025-08-12.raskin-nadler-lofgren-et-al-to-bondi-doj-marshall-bop-re-maxwell.pdf>.

⁷ Josephine Walker, *Trump decries Epstein "hoax" despite Republicans demanding transparency*, AXIOS (Sept. 5, 2025), <https://www.axios.com/2025/09/05/trump-epstein-file-hoax-congress>.

⁸ Peter Aitken, *Trump's "Epstein Hoax" Remark Firmly Rejected in Republican's Online Poll*, NEWSWEEK (Sept. 6, 2025), <https://www.newsweek.com/trump-epstein-hoax-remark-rejected-republican-online-poll-2125709>.

⁹ Peter Wade, *Poll Shows Widespread Disapproval and Suspicion of Trump's Handling of Epstein Files*, ROLLING STONE (Aug. 4, 2025), <https://www.rollingstone.com/politics/politics-news/poll-disapproval-trump-handling-epstein-files-1235399381/>.

- President Trump has repeatedly used the powers of his office to pardon individual sexual predators and give official protection, aid, and comfort to accused rapists and child pornographers.
- President Trump has rewarded numerous individuals who have a personal history of sexual predation and domestic violence by appointing them to his Administration and elevating them to senior positions within the government.

These findings reveal the Trump Administration's structural bias in favor of human traffickers, rapists, and sexual violators and against their victims, survivors, and opponents. The question of why this alignment exists cannot be answered in this memo, but the pattern is unmistakable.

I. THE TRUMP ADMINISTRATION HAS GUTTED OFFICES AND PROGRAMS ESTABLISHED TO STOP HUMAN TRAFFICKING AND VIOLENT SEX CRIMES

The second Trump Administration has systematically dismantled critical efforts to combat human trafficking, sexual violence, and online exploitation. President Trump has fostered an environment in which it is easier for human traffickers and sex offenders to operate and more difficult for victims to escape and seek the help they need.

A. Defunding Effective Anti-Human Trafficking Programs and Altering the Grantmaking Process

In April, the DOJ Office of Justice Programs (OJP) terminated hundreds of grants awarded to state and local police departments to help prevent, investigate, and prosecute violent crimes, including rape and sexual assault.¹⁰ OJP also terminated support for nonprofit organizations that assist survivors of sexual and domestic violence, often by helping victims navigate the legal system and obtain vital social services.¹¹ The impact of these cuts on the victims has been felt nationwide. For example:

- The Trump Administration cut five federal grants for Activating Change, a nonprofit organization that supports domestic violence survivors with disabilities.¹² One of these grants, designed to provide American Sign Language interpretation for domestic violence survivors, recently helped a deaf mother in Virginia escape her abusive husband, gain custody of her children, seek therapy,

¹⁰ Sarah N. Lynch and Peter Eisler, *Exclusive: US Justice Dept grant cuts valued at \$811 million, people and records say*, REUTERS (Apr. 24, 2025), <https://www.reuters.com/world/us/us-justice-dept-grant-cuts-valued-811-million-people-familiar-say-2025-04-24/>.

¹¹ *Id.*

¹² Perry Stein, Tom Jackman & Jeremy Roebuck, *DOJ Cancels Grants for Gun-Violence and Addiction Prevention, Victim Advocacy*, WASH. POST (Apr. 23, 2025), <https://www.washingtonpost.com/national-security/2025/04/22/justice-department-grants-canceled/>; Sarah N. Lynch & Peter Eisler, *Exclusive: US Justice Department Grant Cuts Valued at \$811 Million, People and Records Say*, REUTERS (Apr. 24, 2025), <https://www.reuters.com/world/us/us-justice-dept-grant-cuts-valued-811-million-people-familiar-say-2025-04-24/>.

find a job, and locate new housing.¹³ The Trump Administration no longer supports any of these services.

- The National Organization for Victim Assistance lost a grant designed to train victim advocates to staff domestic violence shelters, hotlines, and rape crisis centers.¹⁴ The Trump Administration no longer supports these services either.
- The DOJ's Office on Violence Against Women (OVW) has terminated all funding opportunities for victims of gender-based violence.¹⁵ In Ohio, the Hope and Healing Resource Center has been forced to fire staff, including court advocates who help survivors navigate the legal system, and scale back on emergency shelter beds, despite already regularly operating at capacity.¹⁶
- The National Crime Victim Law Institute, based out of the Lewis & Clark Law School in Portland, Oregon, lost close to \$500,000 in federal support—undermining programs designed to provide legal services for victims of crime with disabilities and to train emerging lawyers across the field.¹⁷ The Trump Administration's decision to cut these grants means these services will soon be terminated.¹⁸
- The Trump Administration terminated funding for National Court Appointed Special Advocate/Guardians ad Litem (CASA/GAL), which supports child abuse victims across the country and has received federal grants for more than 30 years.¹⁹ The Administration restored some of this funding in August, but only

¹³ Jack Brook & Claudia Lauer, *Layoffs, Closures and Gaps in Oversight Expected After Hundreds of DOJ Grants are Canceled*, WBOC (Apr. 29, 2025), https://www.wboc.com/news/national/layoffs-closures-and-gaps-in-oversight-expected-after-hundreds-of-doj-grants-are-canceled/article_9188b339-deed-53e0-94f3-a984e83c1ed0.html.

¹⁴ Julianne McShane, *Pam Bondi Cuts “Wasteful” Funds to Support Victims of Violent Crime*, MOTHER JONES (Apr. 24, 2025), <https://www.motherjones.com/politics/2025/04/bondi-cuts-wasteful-funds-to-support-victims-of-violent-crime/>.

¹⁵ U.S. Dep't of Just., Off. on Violence Against Women, *Fiscal Year 2025 Open Notices of Funding Opportunities*, Open Notices of Funding Opportunities, Funding, www.justice.gov/ovw/open-notices-of-funding-opportunities (last visited Apr. 24, 2025).

¹⁶ Amanda Friedman, *‘We’re disaster planning’: Trump’s funding freeze rattles domestic violence nonprofits*, POLITICO (Mar. 1, 2025), <https://www.politico.com/news/2025/03/01/funding-freeze-domestic-violence-00206807>.

¹⁷ Yesenia Amaro, *Trump Administration Cuts Off Money for Oregon Organizations that Help Disabled Victims of Crime, Others*, THE OREGONIAN (May 7, 2025), <https://www.oregonlive.com/politics/2025/04/trump-administration-cuts-off-money-for-oregon-organization-that-helps-disabled-victims-of-crime.html>.

¹⁸ *Id.*

¹⁹ Press Release, National Court Appointed Special Advocate/Guardians ad Litem, National CASA/GAL Federal Funding Terminated (Apr. 23, 2025), <https://nationalcasagal.org/national-casa-gal-federal-funding-terminated/>.

after National CASA/GAL instructed its affiliates to never again mention race, class, and gender diversity in its training materials.²⁰

- The Trump Administration also canceled funding for the Association of Forensic Nurses, who train sexual assault nurse examiners in underserved areas.²¹ A 2020 report shows that a shortage of medical personnel makes it all but impossible for rape survivors to obtain the forensic evaluation they require to pursue any recourse through law enforcement.²² The Trump Administration's decision to eliminate support for this program means that fewer survivors will obtain the assistance they need, and more rapists will go free.

In addition to terminating existing grant programs, the Trump Administration has imposed onerous and tone-deaf conditions on any future grant recipients. In July, when DOJ's Office for Victims of Crimes (OVC) released its long-delayed Notice of Funding Opportunities, it announced that all applicants would now be required to give the Department of Homeland Security (DHS) access to information about their programs and clients.²³ Apart from undermining the trust between these organizations and the victims they are meant to serve, this requirement appears to violate both state and federal confidentiality laws and the rules of professional ethics for attorneys and social workers.²⁴ OVC also warned that grant recipients may no longer "unlawfully favor any individuals in any race or protected group," placing funding in doubt for any program that provides services to minority populations or people with disabilities.²⁵ A coalition of 21 state attorneys general has sued the Trump Administration over these new conditions.²⁶

The Trump Administration has also attempted to force its anti-immigration agenda on current and future grantees. OJP sent at least one organization that provides support for trafficking survivors a vaguely worded notice that it may not use grant money "to provide (or to support the provision of) legal services to any removable alien or any alien otherwise unlawfully present in the United States."²⁷ There seems to have been little thought behind how the Trump Administration delivered this warning to other grantees. Many organizations that provide critical

²⁰ Michael Fitzgerald, *Justice Department Restores Grants to Volunteer Charity for Foster Kids, After Group Rolls Back DEI Discussions*, THE IMPRINT (Aug. 19, 2025), <https://imprintnews.org/top-stories/justice-department-restores-grants-to-casa-after-dei-terms-removed/264975>.

²¹ Jack Brook, *Layoffs, Closures and Gaps in Oversight Expected after Hundreds of DOJ Grants are Canceled*, ASSOC. PRESS (Apr. 29, 2025), <https://apnews.com/article/justice-grants-funding-cuts-law-enforcement-victims-18d5cdec6bdbb8472cd1e080e5e4e5ef>.

²² Denise Lavoie, *National Shortage of Forensic Nurses Frustrates Rape Victims*, ASSOC. PRESS (Feb. 19, 2020), <https://apnews.com/general-news-85581077b61c5271480bead612606db7>.

²³ *OVC FY25 Victims of Crime Act (VOCA) Victim Compensation Formula Grant*, U.S. DEP'T OF JUST. OFF. OF VICTIMS OF CRIME, <https://www.ojp.gov/funding/docs/ovc-2025-172429.pdf>.

²⁴ *Id.*

²⁵ *Id.*

²⁶ Claudia Lauer & Mike Catalini, *20 States and D.C. Sue DOJ to Stop Immigration Conditions on Funds for Crime Victims*, PBS NEWS (Aug. 19, 2025), <https://www.pbs.org/newshour/politics/20-states-and-d-c-sue-doj-to-stop-immigration-conditions-on-funds-for-crime-victims>.

²⁷ Email on file with the House Judiciary Committee Democrats.

services in this field have no way of knowing if a victim is lawfully present in the United States. Others, who do not provide legal services to survivors, wonder why they received the notice at all. Further complicating the matter, the notice appears to be directly inconsistent with federal law. Many of the terms in the notice conflict with federal immigration statutes, and federal grantmaking rules require the Trump Administration to take more formal action before it can change the existing terms of a grant for a current grantee.²⁸

President Trump has planned even broader “reforms” to the federal grantmaking process that threaten to normalize abrupt changes and arbitrary policy decisions. In August, President Trump issued an executive order titled “Improving Oversight of Federal Grant Making.”²⁹ The order purports to shift funding decisions away from career civil servants and towards political appointees with the discretion “to ensure [grants] are consistent with agency priorities and the national interest.”³⁰ President Trump has directed these political officers to “use their independent judgment,” rather than performance metrics or evaluation by career experts, in determining whether the program “will advance the President’s priorities.”³¹ The executive order also directs the Office of Management and Budget “to clarify and require all discretionary grants to permit termination for convenience, including when the award no longer advances agency priorities or the national interest,” a change that would permit the Administration to cancel any grant for any reason—or no reason at all—at any time.³²

B. Shuttering Critical Anti-Human Trafficking Agencies and Reassigning Federal Law Enforcement

In addition to ending critical grant programs, the Trump Administration has substantially eroded or destroyed its own ability to disrupt trafficking networks and prosecute crimes of sexual violence.

Early in President Trump’s second term, DOGE (the so-called Department of Government Efficiency) moved quickly and unlawfully to dismantle the U.S. Agency for International Development (USAID). Few agencies in the federal government had been more effective at fighting human trafficking than USAID. Its anti-trafficking work abroad included gathering crucial intelligence on emerging trafficking routes and networks and efforts to combat operations that use forced labor to scam U.S. citizens through sophisticated online operations.³³ Closing USAID has blinded federal law enforcement to developing threats overseas, allowing

²⁸ *Id.*

²⁹ *Improving Oversight of Federal Grantmaking*, THE WHITE HOUSE (Aug. 7, 2025), <https://www.whitehouse.gov/presidential-actions/2025/08/improving-oversight-of-federal-grantmaking/>; Linda Qiu, *Fact-Checking Claims About U.S.A.I.D. Funding*, N.Y. TIMES (Feb. 8, 2025), <https://www.nytimes.com/2025/02/08/us/politics/usaaid-funding-trump-fact-check.html>.

³⁰ *Improving Oversight of Federal Grantmaking* Sec. 3, THE WHITE HOUSE (Aug. 7, 2025), <https://www.whitehouse.gov/presidential-actions/2025/08/improving-oversight-of-federal-grantmaking/>.

³¹ *Id.* at Sec. 4.

³² *Id.* at Sec. 5.

³³ Matt Burgess & Lily Hay Newman, *The Collapse of USAID Is Already Fueling Human Trafficking and Slavery at Scammer Compounds*, WIRED (Feb. 5, 2025) <https://www.wired.com/story/usaaid-collapse-is-helping-criminal-scammers-enslave-people/>.

trafficking networks to strengthen in power, influence, and size, almost certainly leading to an increase in the number of women and children trafficked into the United States.³⁴

In July, the Trump Administration's drastic cuts at the U.S. State Department hollowed out the Office to Monitor and Combat Trafficking in Persons (TIP). Fully staffed at 90 officials, the TIP team worked to combat labor and sex trafficking abroad and helped to coordinate similar efforts across other federal agencies.³⁵ On Friday, July 18, the Administration fired half of the office and demoted the rest.³⁶ TIP is required by law to produce an annual report on trafficking.³⁷ This year's report was due on June 30 but has been delayed without explanation.³⁸

By diverting extraordinary amounts of money and personnel to its immigration crackdown, the Trump Administration has undermined the investigation and prosecution of nearly every other law enforcement priority, including human trafficking and child exploitation. A recent disclosure from Immigration and Customs Enforcement (ICE)³⁹ shows that the Administration has reassigned thousands of federal law enforcement officers to assist in mass deportation, including roughly:

- One in three marshals at the U.S. Marshals Service;
- One in five agents at the Federal Bureau of Investigation;
- Nearly two-thirds of the Bureau of Alcohol, Tobacco, Firearms and Explosives;
- Three-quarters of the Drug Enforcement Agency; and
- Nearly 90% of the personnel at Homeland Security Investigations (HSI), the principal investigative unit of DHS.⁴⁰

Put another way, roughly half of the federal law enforcement personnel who might be assigned to track terrorists, human traffickers, and other criminals have now been assigned exclusively to immigration enforcement. In addition, the Trump Administration has trained an additional 8,500

³⁴ *Id.*

³⁵ Mel Leonor Barclay, Marissa Martinez & Jennifer Gerson, *Trump Administration Pulls Back Work on Combatting Human Trafficking, Long a Top GOP Priority*, 19TH NEWS (July 18, 2025), <https://19thnews.org/2025/07/trump-administration-human-trafficking/>.

³⁶ Meredith Kile, *Trump Administration Guts Office to Combat Human Trafficking amid Criticism over President's Epstein Ties*, PEOPLE (July 21, 2025), <https://people.com/trump-guts-human-trafficking-office-amid-epstein-criticism-11776043>

³⁷ Mel Leonor Barclay, Marissa Martinez & Jennifer Gerson, *Trump Administration Pulls Back Work on Combatting Human Trafficking, Long a Top GOP Priority*, 19TH NEWS (July 18, 2025), <https://19thnews.org/2025/07/trump-administration-human-trafficking>.

³⁸ *Id.*

³⁹ On file with the Committee.

⁴⁰ David J. Bier, *ICE Has Diverted Over 25,000 Officers from Their Jobs*, CATO INST. (Sept. 3, 2025), <https://www.cato.org/blog/ice-has-diverted-over-25000-officers-their-jobs>.

state and local police to conduct arrests on behalf of ICE, raising serious legal questions and further diverting resources away from other responsibilities.⁴¹

In the labor-intensive fight against sexual exploitation and human trafficking, the diversion of law enforcement resources will almost certainly have deadly consequences. In 2023, HSI identified or rescued 1,806 children and arrested 4,214 suspects for crimes involving the sexual exploitation of children.⁴² Last year, before President Trump took office, HSI convened the world's leading experts in the investigation of online child sexual exploitation to conduct a "victim identification surge," resulting in the identification of 19 victims, eight of whom were rescued from active abuse.⁴³ In January, HSI helped to apprehend two men who victimized minors in a global neo-Nazi child exploitation enterprise.⁴⁴ With 90% of the agency now assigned to the President's immigration agenda, these efforts have all but stopped—and the government is left with few resources to stop the criminals who engage in child exploitation, trafficking, and worse.

II. PRESIDENT TRUMP HAS REPEATEDLY ASSISTED AND PARDONED ACCUSED RAPISTS AND CHILD PORNOGRAPHERS

The Trump Administration has dismantled much of the infrastructure designed to combat trafficking, prosecute sex crimes, and provide basic services to victims and survivors. An adjudicated sexual assailant himself,⁴⁵ President Trump has also given direct assistance to other perpetrators of these crimes.

A. The Trump Foreign Policy to Assist the Tate Brothers

In February, self-described "misogynist" Andrew Tate and his brother, Tristan Tate, traveled to Florida despite facing charges of rape and human trafficking in Romania and the United Kingdom.⁴⁶ Their escape to the United States was facilitated directly by the Trump Administration.⁴⁷

⁴¹ *Id.*

⁴² *Id.*

⁴³ Press Release, Dep't of Homeland Security, Homeland Security Investigations, *Partners Conduct US-Based International Victim Identification Surge* (Mar. 12, 2024), <https://www.dhs.gov/archive/hsi/news/2024/03/12/hsi-partners-conduct-us-based-international-victim-identification-surge>.

⁴⁴ Press Release, U.S. Dep't of Justice, Office of Public Affairs, *Four Members of Online Neo-Nazi Group that Exploited Minors Charged with Producing Child Sexual Abuse Material* (Jan. 30, 2025), <https://www.justice.gov/opa/pr/four-members-online-neo-nazi-group-exploited-minors-charged-producing-child-sexual-abuse>.

⁴⁵ Benjamin Weiser, *Appeals Court Upholds Carroll's \$83 Million Judgment Against Trump*, N.Y. TIMES (Sept. 8, 2025), <https://www.nytimes.com/2025/09/08/nyregion/trump-e-jean-carroll-defamation.html>.

⁴⁶ Ian Aikman, *Why did Andrew and Tristan Tate go to the U.S.?*, BBC (Feb. 27, 2025), <https://www.bbc.com/news/articles/cg4kkv3e1v9o>.

⁴⁷ Stephen McGrath, Andreea Alexandru & Daniel Kozin, *Influencer Brothers, Who Face Human Trafficking Charges in Romania, Arrive in the U.S.*, ASSOC. PRESS (Feb. 27, 2025), <https://apnews.com/article/romania-andrew-tate-us-04749679b90fad821c2b945955f5b145>.

Andrew Tate, a dual U.S. and U.K. citizen, rose to fame on British reality television and later became a social media influencer known as “the king of toxic masculinity.”⁴⁸ His brief stint on television ended after a video surfaced showing him attacking a woman, and British authorities launched a separate investigation into an alleged rape.⁴⁹ Andrew Tate subsequently founded “Hustlers University,” which promised to teach men how to become wealthy outside of “traditional employment.”⁵⁰ The subscription-based, online platform was shut down after facing multiple, credible accusations of financial fraud.⁵¹ Later, Andrew Tate faced accusations of grooming women into sex work through an online course called the “Pimpin’ Hoes Degree,” which purported to teach men how to manipulate, socially isolate, and exploit vulnerable women.⁵²

Andrew Tate and his brother, Tristan Tate, moved from the United Kingdom to Romania in 2017.⁵³ At the time, Andrew speculated that he would be less likely to face rape charges there.⁵⁴ In 2022, Romanian police arrested both brothers on charges related to rape, human trafficking, and organized crime. In August 2024, the scope of the investigation was expanded to include criminal allegations from 35 women, including allegations of trafficking minors, sexual intercourse with a minor, and money laundering.⁵⁵ Separately, in the United Kingdom, the Tate brothers each faced charges related to rape, trafficking, bodily harm, and prostitution.⁵⁶

Immediately after taking office, the Trump Administration began to press Romanian officials to lift travel restrictions on the Tate brothers.⁵⁷ White House Special Envoy Richard Grenell raised the issue with Romanian officials at the Munich Security Conference.⁵⁸ On February 27, 2025, while on house arrest in Romania, over the fierce objections of their many alleged victims, the Tate brothers boarded a private jet and flew to Fort Lauderdale, Florida.⁵⁹

⁴⁸ Jennifer Gerson, *The 19th Explains: Andrew Tate, the ‘king of toxic masculinity,’ and his return to the U.S.*, 19TH NEWS (Feb. 27, 2025), <https://19thnews.org/2025/02/andrew-tate-brothers-toxic-masculinity-trump/>.

⁴⁹ See *id.* (noting that the case was ultimately closed in 2019, with no charges filed against Mr. Tate).

⁵⁰ *Id.*

⁵¹ *Id.*; Hustlers University, <https://hustlers-university.ca/> (last accessed Mar. 27, 2025).

⁵² *Id.*

⁵³ Rachel Treisman, *Andrew Tate, Facing Rape and Trafficking Charges in Romania, is Back in the U.S.*, NPR (Feb. 27, 2025), <https://www.npr.org/2025/02/27/nx-s1-5311621/andrew-tate-brothers-romania-florida>.

⁵⁴ Jennifer Gerson, *The 19th Explains: Andrew Tate, the ‘king of toxic masculinity,’ and his return to the U.S.*, 19TH NEWS (Feb. 27, 2025), <https://19thnews.org/2025/02/andrew-tate-brothers-toxic-masculinity-trump/>.

⁵⁵ *Id.*

⁵⁶ Catherine Nicholls, *UK Prosecutors Confirm Charges Against Brothers Include Rape and Human Trafficking*, CNN (May 29, 2025), <https://edition.cnn.com/2025/05/28/uk/tate-brothers-uk-charges-intl>.

⁵⁷ Marton Dunai, Henry Foy & Gideon Rachman, *Trump administration presses Romania to lift restrictions on Andrew Tate*, FINANCIAL TIMES (Feb. 17, 2025), <https://www.ft.com/content/3f951e0b-a9cb-489a-be89-fdf9f996ed27>.

⁵⁸ Ian Aikman, *Why did Andrew and Tristan Tate go to the U.S.?*, BBC (Feb. 27, 2025), <https://www.bbc.com/news/articles/cg4kkv3e1v9o>.

⁵⁹ *Id.*

Just days later, Florida Attorney General James Uthmeier announced a new criminal investigation of the men.⁶⁰ Since returning to the United States, Andrew Tate has been accused of assaulting his girlfriend.⁶¹ One text message Andrew Tate sent her allegedly reads, “I will ruin your life, rape you ... and kill you.”⁶² The Trump Administration has never explained why it singled out the Tate brothers for special treatment.

B. Offering J6 Presidential Pardons to Sex Offenders

On his first day in office, President Trump granted full pardons to nearly 1,600 insurrectionists and rioters who violently attacked the U.S. Capitol and injured at least 140 law enforcement officers on January 6, 2021.⁶³ Because many of these pardoned insurrectionists were prosecuted for other crimes—both before and after the attack on the Capitol—the President’s sweeping pardon provided relief for dozens of human traffickers, sex offenders, and serial abusers. The roster of sex criminals who benefited from this complete disregard for public safety includes:

- Daryl Eugene Johnson, who was arrested in 2023 for spying on and filming naked customers at a tanning salon.⁶⁴ He pled guilty to four counts of invasion of privacy, was sentenced to 45 days on each count to be served consecutively for a total of 180 days and must register with the Iowa Sex Offender Registry for 10 years.⁶⁵
- Kyle Travis Colton, who was indicted by a federal grand jury in California for receiving child sexual abuse materials (CSAM).⁶⁶ Asking for leniency in his Capitol attack case, Mr. Colton argued in January that his pending child pornography charges made “a pardon much less likely.”⁶⁷ He was clearly mistaken. In June, after receiving a pardon for his conduct on January 6th, Mr. Colton filed a motion to dismiss his CSAM indictment, arguing that the pardon

⁶⁰ Claire Moses, *Florida Attorney General Opens Criminal Investigation Into Tate Brothers*, N.Y. TIMES (Mar. 4, 2025), <https://www.nytimes.com/2025/03/04/us/andrew-tate-brothers-florida.html>.

⁶¹ Chloe Melas, Erik Ortiz & Andrew Blankstein, *Los Angeles Woman who dated Andrew Tate says she feared ‘I might die,’* NBC NEWS (Mar. 28, 2025), <https://www.nbcnews.com/news/us-news/andrew-tate-brianna-stern-lawsuit-rcna198242>.

⁶² *Id.*

⁶³ Tom Dreisbach, *Criminal Records of Jan. 6 Rioters Pardoned by Trump Include Rape, Domestic Violence*, NPR (Jan. 30, 2025), <https://www.npr.org/2025/01/30/nx-s1-5276336/donald-trump-jan-6-rape-assault-pardons-rioters>; Michael S. Schmidt & Luke Broadwater, *Officers’ Injuries, Including Concussions, Show Scope Violence at Capitol Riot*, N.Y. TIMES (Feb. 11, 2021), <https://www.nytimes.com/2021/02/11/us/politics/capitol-riot-police-officer-injuries.html>.

⁶⁴ *Id.*

⁶⁵ Mike Bunge, *Clear Lake Tanning Salon Peeper is Sentenced*, KIMT 3 NEWS (July 27, 2023), https://www.kimt.com/news/clear-lake-tanning-salon-peeper-is-sentenced/article_afcbf84a-2cac-11ee-a46a-e3616a12b63a.html.

⁶⁶ Indictment, *United States v. Colton*, 2:24-cr-0029 DAD (E.D. Cal. Feb. 15, 2024); Press Release, U.S. Atty’s Office, Eastern District of Calif., *Citrus Heights Man Indicted for Receiving Child Pornography* (Feb. 20, 2024), <https://www.justice.gov/usao-edca/pr/citrus-heights-man-indicted-receiving-child-pornography>.

⁶⁷ Sentencing Memorandum, *United States v. Colton*, 1:24-cr-00431, (D.D.C. Jan 8, 2025) ECF No. 40.

applies to his other case as well.⁶⁸ The district court denied that motion. On July 15, 2025, Mr. Colton was convicted as charged.

- Andrew Quentin Taake was sentenced to over six years in prison for his role in the insurrection. After President Trump’s pardon, he was released from federal custody—then spent more than two weeks as a fugitive from state and local law enforcement before being rearrested in Texas on longstanding charges that include solicitation of a 15-year-old minor.⁶⁹
- President Trump’s pardon was largely of symbolic benefit for Theodore Middendorf, who in 2024 was sentenced to 19 years in state prison for the sexual assault of a 7-year-old child.⁷⁰ He is subject to lifetime registration as a sex offender in Illinois but now carries the imprimatur of a pardon from President Trump.⁷¹
- David Daniel, who participated in an attempt to break through a barricaded door in the United States Senate, remains in federal custody on charges related to sexual exploitation of a minor and possession of child sexual abuse material.⁷² Between 2015 and 2019, Mr. Daniel allegedly took photographs of a minor victim, forcing her to shower with him and to perform sexual acts with him.⁷³ He allegedly possessed the CSAM from 2015 until his 2024 arrest.⁷⁴ Mr. Daniel contends that President Trump’s pardon protects him from these allegations as well.⁷⁵

Even when reporting suggested that President Trump might withhold clemency from some of the most violent insurrectionists,⁷⁶ there was no discussion of screening these predators out of his plans for a mass pardon. Ultimately, and irresponsibly, he pardoned them all.

⁶⁸ Motion to Dismiss Indictment as Covered by Presidential Pardon, *United States v. Colton*, 2:24-cr-0029 DAD (E.D. Cal. June 8, 2025).

⁶⁹ Robert Downen, *Houston Man Pardoned by Trump Arrested on Child Sex Charge*, TX TRIBUNE (Feb. 6, 2025), <https://www.texastribune.org/2025/02/06/arrest-trump-pardon-insurrection/>.

⁷⁰ Tom Dreisbach, *Criminal Records of Jan. 6 Rioters Pardoned by Trump Include Rape, Domestic Violence*, NPR (Jan. 30, 2025), <https://www.npr.org/2025/01/30/nx-s1-5276336/donald-trump-jan-6-rape-assault-pardons-rioters>.

⁷¹ *Child Sex Offender Information*, IL. STATE POLICE, <https://isp.illinois.gov/Sor/Details/X24A1303> (updated Aug. 8, 2025).

⁷² Pocharapon Neammanee, *Jan. 6 Rioter Pardoned By Trump Remains Jailed in Child Sex Abuse Case*, HUFFPOST (Jan. 28, 2025), https://www.huffpost.com/entry/trump-pardon-child-sexual-abuse-materials_n_679913dae4b0e3bbf46ce8c0.

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ Ryan Oehlri, *NC Man Says His Jan. 6 Pardon from Trump Means Child Porn Charges Should be Dropped Too*, CHARLOTTE OBSERVER (Mar. 29, 2025), <https://www.charlotteobserver.com/news/local/crime/article302996029.html>.

⁷⁶ Alan Feuer, *Trump Grants Sweeping Clemency to All Jan. 6 Rioters*, N.Y. TIMES (Jan. 20, 2025), <https://www.nytimes.com/2025/01/20/us/politics/trump-pardons-jan-6.html>. “‘If you committed violence on that day, obviously you shouldn’t be pardoned,’ Mr. Vance said.” *Id.*

III. PRESIDENT TRUMP HAS FILLED HIS ADMINISTRATION WITH INDIVIDUALS WHO HAVE A HISTORY OF SEXUAL HARASSMENT AND ABUSE

In addition to defunding the organizations that support victims and survivors, crippling the government agencies that disrupt human trafficking networks and prosecute crimes, and providing special assistance to a wide range of sex offenders, President Trump has populated the top ranks of his Administration with individuals who have been repeatedly accused of sexual assault, sexual harassment, and other forms of abuse. Other Administration officials have merely facilitated those crimes.

If President Trump does not consider a record of sexual assault an advantage on an application for a job on his team, he is, at the very least, perfectly accepting of it.

A. Pete Hegseth, Secretary of Defense

On November 12, 2024, President Trump announced that he would nominate Pete Hegseth to serve as Secretary of Defense. Seven years earlier, in October 2017, a woman identified as “Jane Doe” told police that Mr. Hegseth had blocked her from leaving his hotel room and forced her to have sex with him. She also told police that Mr. Hegseth had acted inappropriately towards several other women that same evening.⁷⁷ Mr. Hegseth later paid “Jane Doe” a sum of \$50,000 as part of a settlement agreement.⁷⁸

The Monterey incident reflects a disturbing pattern in Secretary Hegseth’s treatment of woman. During their marriage, Mr. Hegseth’s ex-wife hid from him in a closet and feared for her safety. Similarly, during divorce proceedings, Mr. Hegseth’s mother wrote to him: “On behalf of all the women (and I know it’s many) you have abused in some way, I say ... get some help and take an honest look at yourself.”⁷⁹

These reports did not dissuade the Trump Administration from advancing Secretary Hegseth’s nomination.⁸⁰ Secretary Hegseth is now in charge of 1.4 million active-duty uniformed personnel and 747,000 civilians. Servicemembers reported 8,195 acts of sexual assault in fiscal

⁷⁷ Casey Tolan, Scott Glover & Sara Murray, *Police Report Reveals New Details from Sexual Assault Allegation Against Trump’s Defense Secretary Nominee*, CNN (Nov. 21, 2024), <https://www.cnn.com/2024/11/21/politics/pete-hegseth-police-report-defense-secretary-trump>.

⁷⁸ Tara Copp, *Hegseth Told Senator He Paid \$50,000 To Woman Who Accused Him Of 2017 Sex Assault*, ASSOC PRESS (Jan. 23, 2025), <https://apnews.com/article/hegseth-sex-assault-payment-trump-6674cc8cfee654c374725948e01ff666>.

⁷⁹ Karoun Demirjian & Sharon LaFranier, *Hegseth Ex-Sister-in-Law Tells Senators He Was ‘Abusive’ to Second Wife*, N.Y. TIMES (Jan. 21, 2025), <https://www.nytimes.com/2025/01/21/us/politics/hegseth-senators-affidavit.html>; <https://www.nytimes.com/2024/11/29/us/politics/pete-hegseth-mother-email.html>.

⁸⁰ *Trump Stands by Pentagon Pick Hegseth as Nomination in Doubt*, REUTERS (Dec. 6, 2024), <https://www.reuters.com/world/us/trump-stands-by-pentagon-pick-hegseth-nomination-doubt-2024-12-06/>.

year 2024 alone.⁸¹ Less than a month into his tenure, Secretary Hegseth paused sexual-assault prevention and response training for the U.S. Navy.⁸²

B. Linda McMahon, Secretary of Education

Linda McMahon has served in President Trump’s Cabinet in both terms, first as Small Business Administration Administrator and now as Secretary of Education. Her former employees in the private sector have levied serious allegations that Ms. McMahon overlooked years of child sex abuse during her tenure as the Chief Executive Officer of World Wrestling Entertainment (WWE). In October 2024, five John Does, all former “ring boys” for the WWE, filed a lawsuit alleging that a WWE ringside announcer groomed, exploited, and sexually abused them when they were between 13 and 15 years old—targeting children from broken homes.⁸³

According to the filing, Ms. McMahon was both aware of the ringside commentator’s “peculiar and unnatural interest” in young boys and later became aware of the abuse itself. While the commentator was initially fired, Ms. McMahon and her then-husband, Vince McMahon, “rehired him six weeks later, on the condition that he ‘steer clear from kids.’” Back on the job, the ringside announcer continued to sexually exploit young boys—with Ms. McMahon’s knowledge—for years.⁸⁴

C. Robert F. Kennedy, Jr., Secretary of Health and Human Services

Robert F. Kennedy Jr. serves as President Trump’s Secretary of Health and Human Services. Eliza Cooney, the Kennedy family’s former babysitter, reported that in the late 1990s, Mr. Kennedy “came up behind her, blocked her inside the room, and began groping her, putting his hands on her hips and sliding them up along her rib cage and breasts.”⁸⁵ When these allegations came to light in advance of his confirmation hearings, Mr. Kennedy told reporters that he has “skeletons in his closet.” When asked if there would be more stories of sexual assault or harassment, Mr. Kennedy said, “[w]e’ll see what happens.”⁸⁶

⁸¹ *Annual Report of Sexual Assault in the Military, Fiscal Year 2024*, DEP’T OF DEFENSE (Mar. 13, 2025), https://www.sapr.mil/Portals/156/FY24_Annual_Report.pdf.

⁸² Audrey Decker, *Navy Pauses Sexual-Assault Prevention and Response Training*, DEFENSE ONE (Feb. 6, 2025), <https://www.defenseone.com/policy/2025/02/navy-pauses-sexual-assault-prevention-and-response-training/402829/>.

⁸³ Patrick Smith, *Vince McMahon and WWE Accused of Allowing ‘Rampant’ Sexual Exploitation of Young Boys by Announcer in New LawsUIT*, NBC NEWS (Oct. 25, 2024), <https://www.nbcnews.com/news/us-news/vince-mcmahon-wwe-accused-allowing-rampant-sexual-exploitation-young-b-rcna176988>.

⁸⁴ *Id.*; Matt Steib, *Trump’s Education Pick, Linda McMahon, Has a Long History of Scandals*, N.Y. MAGAZINE (Nov. 20, 2024), <https://nymag.com/intelligencer/article/linda-mcmahon-trump-education-pick-is-dogged-by-scandal.html>.

⁸⁵ Joe Hagan, *RFK Jr.’s Family Doesn’t Want Him to Run. Even They May Not Know His Darkest Secrets*, VANITY FAIR (July 2, 2024), <https://www.vanityfair.com/news/story/robert-kennedy-jr-shocking-history>.

⁸⁶ Brittany Gibson, *Robert F. Kennedy Jr. Texted Apology to Woman He Allegedly Sexually Assaulted, Washington Post And NBC News Reports Say*, POLITICO (July 12, 2024), <https://www.politico.com/news/2024/07/12/rfk-jr-sexual-assault-apology-00167867>.

D. The Department of Government Efficiency

In January and February 2025, President Trump tasked billionaire Elon Musk with heading the so-called Department of Government Efficiency (DOGE), an effort putatively to attack waste in the federal government that ended up wrecking numerous agencies and costing taxpayers millions.⁸⁷ DOGE itself experienced significant staffing and organizational problems. The hiring process for DOGE was opaque and rushed. Several officials were hired quickly from Mr. Musk's corporate empire without proper vetting.⁸⁸

Mr. Musk has been accused of sexual misconduct in both his professional and his personal capacity. In June 2024, eight former Space X employees sued Mr. Musk for his role in knowingly permitting and fostering a work culture rife with sexual harassment, including his practice of "interjecting into the workplace vile sexual photographs, memes, and commentary that demeaned women and/or the LGBTQ+ community."⁸⁹

Mr. Musk has also been credibly accused of sexual harassment. In 2016, a flight attendant on Mr. Musk's private jet reported that he exposed himself to her, rubbing her leg without consent, and offered to buy her a horse in exchange for sexual acts. In other instances, Mr. Musk engaged in a sexual relationship with an intern two decades younger than he is and asked another employee to bear his children.⁹⁰

Mr. Musk named Jeremy Lewin, a 28-year-old tech entrepreneur with no government experience, Acting Director of the State Department's Office of Foreign Assistance. Mr. Lewin has a history of misogyny, racism, and violent outbursts—including, most notably, threatening a female classmate with a knife and asking her why "he shouldn't gut [her] and cut [her] right now," leading the victim to tell police officers that she feared for her life.⁹¹

Edward Corstine, a 19-year-old DOGE employee who began his career by working as an intern at Mr. Musk's Neuralink venture, has held various roles within the Trump Administration, including with the General Services Administration and the Social Security Administration. Prior to his DOGE work, Mr. Corstine—also known as "Big Balls"—created a website called "tesla.sexy" which incorporated a number of domains, including "child-porn.store," "children-

⁸⁷ Aimee Picchi, *DOGE says it has saved \$160 billion. Those cuts have cost taxpayers \$135 billion, one analysis says.*, CBS NEWS (Apr. 28, 2025), <https://www.cbsnews.com/news/doge-cuts-cost-135-billion-analysis-elon-musk-department-of-government-efficiency/>.

⁸⁸ Laura Wamsley, *The Government Already Knows a Lot About You. DOGE Is Trying to Access All of It*, NPR (Mar. 11, 2025), <https://www.npr.org/2025/03/11/nx-s1-5305054/doge-elon-musk-security-data-information-privacy>.

⁸⁹ Matt Steib, *Elon Musk is Suddenly Drowning in Misconduct Allegations*, N.Y. MAGAZINE, (June 12, 2024), <https://nymag.com/intelligencer/article/elon-musk-misconduct-allegations.html>.

⁹⁰ *Id*; Joe Palazolo & Khadeeja Safdar, *Elon Musk's Boundary-Blurring Relationships With Women at SpaceX*, WALL ST. JOURNAL (June 11, 2024), <https://www.wsj.com/business/elon-musk-spacex-employee-relationships-8bca2806>.

⁹¹ Peter Beaumont, *Doge Employee Allegedly Has History Of Misogyny, Racism And Violent Outbursts*, THE GUARDIAN (Apr. 1, 2025), <https://www.theguardian.com/us-news/2025/apr/01/doge-employee-misogyny-racism-violence>.

sex.party,” and “ketamine-rape.date.” Mr. Corstine has also been involved with a group called “The Com” that is linked to violent social manipulation and child sextortion.⁹²

E. Ambassador Nominees

In January 2025, President Trump nominated Andrew Puzder to serve as ambassador to the European Union.⁹³ In 2019, Mr. Puzder withdrew from consideration as Secretary of Labor after several women accused him of sexual harassment and abuse. In one instance, a former employee sued Mr. Puzder, alleging he sexually harassed her at one of his companies; in another, Mr. Puzder’s ex-wife alleged significant verbal and physical abuse.⁹⁴ In the private sector, employees at Mr. Puzder’s companies have experienced “disturbing rates” of sexual harassment.⁹⁵

President Trump’s previous ambassador to the European Union, Gordon Sondland, was similarly accused of sexual harassment and retaliation by three women.⁹⁶

President Trump nominated Kimberly Guilfoyle, his son’s ex-girlfriend and a former Fox News host, to serve as ambassador to Greece. Fox News asked Ms. Guilfoyle to leave the network following a human resources investigation into allegations of inappropriate behavior, including sexual misconduct. According to a former assistant, Ms. Guilfoyle forced the subordinate to work at Ms. Guilfoyle’s apartment while Ms. Guilfoyle herself was naked, showed the assistant photographs of genitalia, and told the assistant she should submit to a Fox employee’s demand for sexual favors. Fox News paid the accuser \$4 million to resolve the explosive accusations.⁹⁷

President Trump also nominated former Massachusetts Senator Scott Brown to serve as ambassador to New Zealand, a post he held during the first Trump Administration. In 2016, Fox News host Andrea Tantaros alleged that Mr. Brown made several sexually inappropriate comments to her, crept up behind her in the cafeteria, and touched her without her consent.⁹⁸

⁹² Joe Wilkins, *One of Elon Musk's DOGE Boys Reportedly Ran a Disgusting Image Hosting Site Linked to Domains About Child Sexual Abuse*, YAHOO NEWS (Feb. 13, 2025), <https://www.yahoo.com/news/one-elon-musks-doge-boys-150714778.html>.

⁹³ Eric Bazail-Eimil, *Puzder Gets a Softer Treatment In Second Senate Confirmation Process*, POLITICO (June 10, 2025), <https://www.politico.com/news/2025/06/10/puzder-gets-a-softer-treatment-in-second-senate-confirmation-process-00398042>.

⁹⁴ *Id.*; Robin Urevich, *Labor Secretary Nominee Puzder Sexually Harassed Senior CKE Female Executive, 2004 Lawsuit Alleged*, NEWSWEEK (Feb. 20, 2017), <https://www.newsweek.com/labor-secretary-nominee-puzder-sexual-harassment-lawsuit-alleged-557239>.

⁹⁵ Steven Greenhouse, *The Questions Trump's Labor Secretary Nominee Andrew Puzder Must Answer*, THE GUARDIAN (Feb. 15, 2017), <https://www.theguardian.com/us-news/2017/feb/15/andrew-puzder-labor-secretary-confirmation-hearing-questions>.

⁹⁶ Neil Vigdor & Alex Traub, *Three Women Accuse Gordon Sondland of Sexual Misconduct, Report Says*, N.Y. TIMES (Nov. 27, 2019), <https://www.nytimes.com/2019/11/27/us/Gordon-Sondland-sexual-harassment.html>.

⁹⁷ Jane Mayer, *The Secret History of Kimberly Guilfoyle's Departure from Fox*, NEW YORKER (Oct. 1, 2020), <https://www.newyorker.com/news/news-desk/the-secret-history-of-kimberly-guilfoyles-departure-from-fox>.

⁹⁸ Shannon Young, *Former US Sen. Scott Brown Says Sexual Harassment Accusations Are 'Fabricated'*, MASSLIVE (Aug. 24, 2016), https://www.masslive.com/politics/2016/08/former_us_sen_scott_brown_says_1.html.

During his first appointment in New Zealand, State Department officials investigated Ambassador Brown for misconduct after he engaged in numerous forms of inappropriate behavior, including blatantly staring at a Peace Corps volunteer's breasts.⁹⁹

F. Other Trump Administration Officials

In 2017, the Trump Administration hired Steven Munoz as Assistant Chief of Visits for the State Department. Soon thereafter, Mr. Munoz was accused of multiple sexual assaults while a student at The Citadel military college. Specifically, five male freshmen alleged that Mr. Munoz used his position as an upperclassman to groom and sexually assault them. An investigation by the school determined that "certain assaults likely occurred."¹⁰⁰ In the years since, Mr. Munoz served various roles in President Trump's 2024 campaign. He is now Deputy Chief of Staff at DHS, where nearly one-third of law enforcement employees surveyed report experiencing sexual harassment or misconduct.¹⁰¹

In March 2025, President Trump chose Waltine Nauta, who was President Trump's co-defendant in the classified document trial, to serve on the U.S. Navy's Board of Visitors, which is officially tasked with overseeing "the state of morale and discipline, curriculum, instruction, physical equipment, fiscal affairs, academic methods, and other matters relating to the Naval Academy."¹⁰² In 2021, Mr. Nauta was demoted, stripped of his White House security clearance and escorted from the White House grounds after three female servicemembers accused him of sexual harassment, including engaging in revenge porn.¹⁰³

Corey Lewandowski currently serves a Special Government Employee in DHS and, by many reports, serves as the de-facto Chief of Staff to Secretary Kristi Noem.¹⁰⁴ In 2021, the wife

⁹⁹ Julian Borger, *Scott Brown: More Complaints Surface Over Behaviour Of US Ambassador To New Zealand*, THE GUARDIAN (Oct. 26, 2017), <https://www.theguardian.com/world/2017/oct/26/scott-brown-more-complaints-surface-over-behaviour-of-us-ambassador-to-new-zealand>.

¹⁰⁰ Justin Eliot, *Trump Administration Hires Official Whom Five Students Accused of Sexual Assault*, PROPUBLICA (May 2, 2017), <https://www.propublica.org/article/trump-administration-hires-official-five-students-accused-sexual-assault>.

¹⁰¹ Adam Zagorin & Nick Schwellenbach, *Protecting the Predators at DHS*, PROJECT ON GOV'T OVERSIGHT (Apr. 7, 2022), <https://www.pogo.org/investigations/protecting-the-predators-at-dhs>.

¹⁰² Ali Bianco, *Trump Names Walt Nauta, Co-Defendant in Classified Documents Case, Other Allies to Naval Academy Board*, POLITICO (Mar. 8, 2025), <https://www.politico.com/news/2025/03/08/trump-navy-board-of-visitors-00002938>; *Office of the Superintendent*, U.S. Naval Academy, <https://www.usna.edu/PAO/Superintendent/bov.php> (last visited Sept. 4, 2025).

¹⁰³ Ja'Han Jones, *Trump Taps His Classified Docs Co-Defendant To Oversee The U.S. Naval Academy*, MSNBC (Mar. 10, 2025), <https://www.msnbc.com/top-stories/latest/trump-walt-nauta-us-naval-academy-rcna195675>; Roger Sollenberger, *He Was Accused of Sexual Misconduct. Then Trump Hired Him. Then He Was Indicted in Mar-a-Lago Case*, DAILY BEAST (Feb. 1, 2024), <https://www.yahoo.com/news/accused-sexual-misconduct-then-trump-031224882.html>.

¹⁰⁴ Christina Cauterucci, *An Alleged Not-So-Secret D.C. Affair Tells Us Everything About the Trump Administration*, SLATE (Aug. 12, 2025), <https://slate.com/news-and-politics/2025/08/kristi-noem-corey-lewandowski-alleged-affair-dhs-trump.html>; Priscilla Alvarez et al., *How Corey Lewandowski's power at the Department of Homeland Security keeps growing*, CNN (Aug. 5, 2025), <https://www.cnn.com/2025/08/05/politics/corey-lewandowski-growing-power-dhs>.

of a Republican donor accused Mr. Lewandowski of assault and stalking.¹⁰⁵ In that instance, Nevada prosecutors charged Mr. Lewandowski with misdemeanor battery and reached an agreement to dismiss the charges in exchange for community service, a fine, and an apology.¹⁰⁶ Mr. Lewandowski had previously been charged with battery for grabbing a woman during the 2016 campaign, and another woman told police that he inappropriately and repeatedly touched her during a holiday party at the Trump Hotel in Washington, D.C.¹⁰⁷

IV. CONCLUSION

President Trump has eliminated programs that once provided vital services to the victims and survivors of human trafficking and sexual violence. He has severely limited the ability of federal, state, and local law enforcement agencies to interrupt and prosecute these crimes. He has helped serial abusers escape accountability at home and abroad. He has pardoned sex offenders and convicted child pornographers. He has elevated individuals with deeply troubling histories of abuse to senior positions in his Administration. In short, given a choice between an abuser and his victim, President Trump has consistently sided with abusers.

While President Trump's motives for this bias are beyond the scope of this memo, it is notable that he deploys the classic behavior of a serial abuser: denying the harm of his actions, attacking the credibility of survivors, blaming others, and positioning himself as the victim of a supposedly woke and radical agenda.¹⁰⁸ "Even Trump's Sexual Assault Awareness Month proclamation earlier this month was offensive—laced with anti-immigrant rhetoric and false claims that undocumented immigrants are driving sexual violence. The truth? Most survivors are assaulted by someone they know. But scapegoating marginalized communities is easier than addressing systemic harm."¹⁰⁹

On September 8, 2025, speaking at the Museum of the Bible, President Trump expressed regret that incidents of domestic violence might be reflected in current crime data. "If a man has a little fight with the wife, they say this was a crime."¹¹⁰ Current rates of domestic violence unquestionably represent a national health crisis.¹¹¹ The President seems to believe that domestic violence should not be treated as a crime, that the domestic violence epidemic has somehow been exaggerated to harm his agenda, or both. Either way, in a choice between an abuser and his victim, the President has chosen a side.

¹⁰⁵ Daniel Klaidman et. al, *Woman Who Accused Corey Lewandowski of Assault Speaks Out: "I Don't Want This To Happen To Anyone Else"*, CBS News (Oct. 4, 2024), <https://www.cbsnews.com/news/corey-lewandowski-accuser-trashelle-odom-stalking-assault/>.

¹⁰⁶ *Id.*

¹⁰⁷ *Id.*

¹⁰⁸ Shiwali Patel, *Abuse of Power: How the Trump Administration Is Undermining Survivors of Sexual Violence*, NAT'L WOMEN'S LAW CENTER (Apr. 16, 2025), <https://nwlc.org/abuse-of-power-how-the-trump-administration-is-undermining-survivors-of-sexual-violence/>.

¹⁰⁹ *Id.*

¹¹⁰ Mel Leonor Barelay, *Trump downplays domestic violence in speech about religious freedom*, 19TH NEWS (Sept. 8, 2025), <https://19thnews.org/2025/09/trump-speech-domestic-violence/>.

¹¹¹ *About Intimate Partner Violence*, CENTERS FOR DISEASE CONTROL (May 16, 2024), <https://www.cdc.gov/intimate-partner-violence/about/index.html>.

Perhaps his reasons are personal. President Trump is, of course, the first president to have been found liable for sexual abuse,¹¹² as well as the first president to have been found liable for the lies he told about that abuse.¹¹³ In rejecting the President's appeal of an \$83.3 million jury award to writer E. Jean Carroll, a federal appeals court agreed that "the degree of reprehensibility of Mr. Trump's conduct was remarkably high, perhaps unprecedented."¹¹⁴ Moreover, "the jury was entitled to find that Trump would not stop defaming Carroll unless he was subjected to a substantial financial penalty."¹¹⁵ Perhaps, in siding with serial abusers over their victims, President Trump is modeling the kind of protection he hopes to receive as his own case winds its way to the United States Supreme Court.¹¹⁶

Whatever his motivations, it is clear that across the entire enterprise of his second administration, President Trump has aligned himself with human traffickers, sexual predators, and other violent criminals. The pattern is obvious, it is alarming, and it is a far bigger problem than the files of Jeffrey Epstein.

¹¹² Lola Fadulu, *Trump Loses Appeal of Carroll's \$5 Million Award in Sex-Abuse Case*, N.Y. TIMES (Dec. 30, 2024), <https://www.nytimes.com/2024/12/30/nyregion/trump-carroll-appeal-denied.html>.

¹¹³ Benjamin Weiser, *Appeals Court Upholds Carroll's \$83 Million Judgment against Trump*, N.Y. TIMES (Sept. 8, 2025), <https://www.nytimes.com/2025/09/08/nyregion/trump-e-jean-carroll-defamation.html>.

¹¹⁴ *Carroll v. Trump*, No. 24-644 (2d Cir. 2025, Sept. 8, 2025), at 64.

¹¹⁵ *Id.* at 67.

¹¹⁶ Josephine Walker, *Trump to ask SCOTUS to reverse E. Jean Carroll sex-abuse verdict*, AXIOS (Sept. 3, 2025), <https://www.axios.com/2025/09/03/trump-e-jean-carroll-verdict-scotus>.