

ONE HUNDRED NINETEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON THE JUDICIARY

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September 22, 2025

The Honorable Pamela J. Bondi
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

The Honorable Kashyap Patel
Director
Federal Bureau of Investigation
935 Pennsylvania Avenue, NW
Washington, DC 20530

Dear Attorney General Bondi and Director Patel:

Do the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI) have video and audio recordings of White House “Border Czar” Tom Homan accepting \$50,000 in cash bribes from undercover FBI agents stuffed in a brown paper takeout bag from the restaurant chain Cava?

It certainly sounds like you do.

Recent published reports say that your Administration has shut down an investigation by the DOJ and FBI into Mr. Homan for taking \$50,000 in cash payments from undercover FBI agents posing as corrupt businessmen in exchange for Mr. Homan “awarding contracts should Trump win the presidential election.”¹ Confirmed by six sources and reportedly captured on recordings now in DOJ and FBI’s possession, this startling episode is powerful evidence that Mr. Homan may have committed multiple federal felonies, including conspiracy to commit bribery. Your reported effort to shut down this investigation appears to be a brazen cover-up to protect Donald Trump’s allies, at a time when the DOJ and FBI are also being ordered to aggressively pursue prosecution of Donald Trump’s political enemies.²

We demand that both of you immediately turn over all recordings from Mr. Homan’s meeting, as well as all files from this investigation of purported bribery involving Mr. Homan. This is an untenable situation.

In September 2024, federal agents in Texas were engaged in a long-running counterintelligence investigation unrelated to Mr. Homan when one of their subjects claimed that

¹ Carol Leonnig & Ken Dilanian, *Tom Homan Was Investigated for Accepting \$50,000 From Undercover FBI Agents. Trump’s DOJ Shut It Down.*, MSNBC (Sept. 20, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rena232568>.

² Alan Feuer et al., *Trump Demands That Bondi Move ‘Now’ to Prosecute Foes*, N.Y. TIMES (Sept. 20, 2025), <https://www.nytimes.com/2025/09/20/us/politics/trump-justice-department-us-attorneys.html>.

Mr. Homan was soliciting payments in exchange for doling out future federal contracts if Donald Trump won the election.³ Acting on this lead, FBI agents posing as business executives met with Mr. Homan. According to internal Justice Department documents corroborated by multiple sources, hidden cameras and audiotapes captured Mr. Homan accepting \$50,000 in cash in a restaurant takeout bag and agreeing to help the agents.⁴

That reporting, if true, is evidence of multiple crimes. The former chief of public corruption in the U.S. Attorney's Office in D.C. describes Mr. Homan's conduct as a strong case of conspiracy to commit bribery. For the "agreement itself is the conspiracy crime," and would remain a crime even if the promisor "were never even appointed to anything at all."⁵ Federal prosecutors were investigating a host of potential charges, including federal conspiracy, bribery, and fraud counts. The Justice Department's Public Integrity Section, an elite unit of federal corruption prosecutors, joined the case in November 2024.⁶

That is all scandal enough, but the apparent cover-up that happened next is utterly shocking. When the Trump Administration took power, it swiftly killed the investigation. In early 2025, a Trump Justice Department employee called the case a "deep state" probe and the investigation stalled.⁷ Shortly after President Trump's inauguration, then-acting Deputy Attorney General Emil Bove was briefed on the case and told Department staff that he "did not support the investigation."⁸ In recent weeks, Director Patel apparently "requested a status update" on the case, after which it was officially closed.⁹

Your explanation for your actions has been incomplete, unconvincing, and at times downright embarrassing. Together with Deputy Attorney General Todd Blanche, you have emphasized that the investigation "originated under the previous administration," as though that completely normal state of affairs somehow made an independent investigation carried out by special agents and career prosecutors improper.¹⁰ Criminal investigations and prosecutions obviously go from one administration to the next all the time. In fact, under your leadership, DOJ and FBI have repeatedly taken credit for arrests, indictments, and convictions resulting from long-running investigations carried out under the previous Administration, something we saw as

³ Carol Leonnig & Ken Dilanian, *Tom Homan Was Investigated for Accepting \$50,000 From Undercover FBI Agents. Trump's DOJ Shut It Down.*, MSNBC (Sept. 20, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

⁴ Devlin Barrett et al., *Trump Justice Dept. Closed Investigation Into Tom Homan for Accepting Bag of Cash*, N.Y. TIMES (Sept. 20, 2025), <https://www.nytimes.com/2025/09/20/us/politics/tom-homan-fbi-trump.html>.

⁵ Carol Leonnig & Ken Dilanian, *Tom Homan Was Investigated for Accepting \$50,000 From Undercover FBI Agents. Trump's DOJ Shut It Down.*, MSNBC (Sept. 20, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ Ben Johansen, *Border Czar Tom Homan Was Investigated by DOJ For Potential Bribery*, MSNBC Reports, POLITICO (Sept. 20, 2025), <https://www.politico.com/news/2025/09/20/tom-homan-department-of-justice-investigation-00574379>.

recently as Director Patel's testimony before the House Judiciary Committee.¹¹ You have added that the matter was "subjected to a full review by FBI agents and Justice Department prosecutors," who "found no credible evidence of any criminal wrongdoing."¹² Those obsequious agents and prosecutors must not have talked to the agents and prosecutors who just months earlier were preparing to indict Mr. Homan on four separate criminal charges based on recordings showing him accepting a \$50,000 cash bribe and other evidence gathered as part of the investigation.

During the Reagan Administration, E. Robert Wallach was convicted for taking payments while promising to influence contracts once he received a Justice Department appointment—despite not having landed a job at the time he pocketed the bribes.¹³ That is exactly what Mr. Homan did here. If this Administration's position to the world is that pre-appointment bribery is now legal, you have just drawn up a blueprint for corruption that would leave all of your predecessors in office aghast.

The "no credible evidence" line rings especially tinny because that is the same line the Trump DOJ and FBI are using about the Epstein files. In your July 7th Joint Memorandum, your agencies wrote that there was "no credible evidence" in the Epstein case that could "predicate an investigation against uncharged third parties" and that "no further disclosure would be

¹¹ See, e.g., *Arizona Man Convicted of Crimes Arising Out of Plot Targeting Christian Churches*, DEP'T OF JUST. (Apr. 4, 2025), <https://www.justice.gov/opa/pr/arizona-man-convicted-crimes-arising-out-plot-targeting-christian-churches> (Attorney General Bondi emphasizing that "[t]his Department of Justice has no tolerance for" religious violence, omitting that the Biden Administration brought the original charges in March 2024, see *Arizona Resident Charged with Bomb Hoax Against Sacramento Area Church*, DEP'T OF JUST. (Mar. 1, 2024), <https://www.justice.gov/usao-edca/pr/arizona-resident-charged-bomb-hoax-against-sacramento-area-church>); see also, e.g., *Canadian Man Charged in \$65M Cryptocurrency Hacking Schemes*, DEP'T OF JUST. (Feb. 3, 2025), <https://www.justice.gov/opa/pr/canadian-man-charged-65m-cryptocurrency-hacking-schemes> (announcing indictment featuring career agents two weeks into Trump Administration); *Four Pharmacists Sentenced for Roles in \$13M Medicare, Medicaid and Private Insurer Fraud Conspiracy*, DEP'T OF JUST. (Feb. 6, 2025), <https://www.justice.gov/opa/pr/four-pharmacists-sentenced-roles-13m-medicare-medicare-and-private-insurer-fraud-conspiracy> (similar with sentencing); Robert Farley, *Trump Now Citing Murder Stats He Used to Dismiss as 'Fake News'*, FACTCHECK.ORG (June 12, 2025), <https://www.factcheck.org/2025/06/trump-now-citing-murder-stats-he-used-to-dismiss-as-fake-news/>; *Crime Is Down in 2025. Trump Doesn't Deserve Credit.*, VERA (June 20, 2025), <https://www.vera.org/news/crime-is-down-in-2025-trump-doesnt-deserve-credit>; *FBI Releases 2024 Reported Crimes in the Nation Statistics*, FED. BUREAU OF INV., (Aug. 5, 2025), <https://www.fbi.gov/news/press-releases/fbi-releases-2024-reported-crimes-in-the-nation-statistics> (discussing falling crime rates from 2024 that Director Patel claimed credit for in his hearing).

¹² *Id.*

¹³ Carol Leonnig & Ken Dilanian, *Tom Homan Was Investigated for Accepting \$50,000 From Undercover FBI Agents. Trump's DOJ Shut It Down.*, MSNBC (Sept. 20, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>; see also James Traub, *The Misadventures of E. Robert Wallach*, N.Y. TIMES (June 19, 1988), <https://www.nytimes.com/1988/06/19/magazine/the-misadventures-of-e-robert-wallach.html>. A higher court later overturned the conviction on unrelated grounds—because a witness admitted to lying about a matter unrelated to the case against Wallach. See Laurie Goodstein, *Wedtech Convictions of Wallach and 2 Others Reversed*, WASH. POST (May 31, 1991), <https://www.washingtonpost.com/archive/politics/1991/06/01/wedtech-convictions-of-wallach-and-2-others-reversed/e5e43a26-f205-4106-934b-fb97836de290/>; *United States v. Wallach*, 979 F.2d 912 (2d Cir. 1992).

appropriate or warranted.”¹⁴ Both Republican and Democratic Members of Congress have railed against the absurdity of claiming that Jeffrey Epstein and Ghislaine Maxwell acted alone in operating a multi-year, international sex trafficking ring that victimized more than 1,000 women and involved more than \$1.5 billion in suspicious transactions.¹⁵ Since then, the American people have heard from the survivors of this sex trafficking ring, have read the emails released by Bloomberg, and have seen the infamous “birthday book” released by the House Oversight Committee, all of which have made vividly clear that your evasive and conclusory claims are demonstrably false. This Justice Department has no credibility left when it makes promises of “nothing to see here” relating to Administration political cover-ups.

Mr. Homan today wields enormous influence over this Administration’s mass roundup of immigrants, including those President Trump himself described as “very good, long time workers.”¹⁶ As we explained in our letter dated August 25, 2025—a letter which remains unanswered—Mr. Homan is in charge of a policy of mass arrests and deportations that involves billions and billions of taxpayer dollars.¹⁷ Many of these payments have gone to private contractors including Mr. Homan’s former client GEO Group.¹⁸ In fact, GEO Group, a private detention facility operator, has received multiple new contracts to expand U.S Immigration and Customs Enforcement detention capacity since January—worth over a billion dollars.¹⁹ The corruption investigation you killed would have examined whether Mr. Homan was selling these contracts for personal profit before he even had the power to award them. By shutting it down, you have given Mr. Homan and others like him carte blanche to take bribes for lucrative contracts paid for with taxpayer money.

¹⁴ Memorandum, DEP’T OF JUST., FED. BUREAU OF INV. (July 7, 2025), <https://www.justice.gov/opa/media/1407001/dl>.

¹⁵ See Hailey Fuchs, *Massie Implores GOP Colleagues to Help Force Vote to Release Epstein Files*, POLITICO (Sept. 3, 2025), <https://www.politico.com/news/2025/09/03/massie-gop-release-epstein-files-00541753> (Rep. Massie: “The Washington establishment is asking the American public to believe something that is not believable. They’re asking you to believe that two individuals created hundreds of victims, and they acted alone, and that the DOJ has no idea of who else might’ve been involved.”); Rebecca Beitsch, *Patel Blames Trump’s Former Labor Secretary for ‘Original Sin’ on Epstein Case*, THE HILL (Sept. 16, 2025), <https://thehill.com/homenews/senate/5505908-kash-patel-epstein-case-criticism/> (Sen. Kennedy: “The essential question for the American people is this, they know that Epstein trafficked young women for sex to himself—they want to know who, if anyone else, he trafficked these young women too [sic]. And that’s a very fair question. I want to know that answer. And I think you’re going to have to do more to satisfy the American people’s understandable curiosity.”); Press Release, H. Comm on the Judiciary Democrats, *Under Director Kash Patel, FBI Is Covering Up Trump’s Relationship with Epstein, Sacking Experienced Counterterrorism Agents, and Endangering Public Safety* (Sept. 17, 2025), <https://democrats-judiciary.house.gov/media-center/press-releases/under-director-kash-patel-fbi-is-covering-up-trump-s-relationship-with-epstein-sacking-experienced-counterterrorism-agents-and-endangering-public-safety>.

¹⁶ See Priscilla Alvarez & Phil Mattingly, *Trump Administration Quietly Tries to Find A Solution for Migrant Workers Amid Industry Concerns*, CNN (July 3, 2025), <https://www.cnn.com/2025/07/03/politics/trump-migrant-farmworkers-deportations>.

¹⁷ Letter from Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, to Mr. Tom Homan, Border Czar, U.S. Dep’t of Homeland Security (Aug. 25, 2025), https://democrats-judiciary.house.gov/sites/evo-subsites/democrats-judiciary.house.gov/files/evo-media-document/2025-08-25.raskin-jayapal-crockett-to-homan-dhs-re-geo-group_0.pdf.

¹⁸ *Id.*

¹⁹ *Id.*

This Committee is investigating the Trump Administration's pattern of abusing its prosecutorial and law enforcement functions to excuse clearly unlawful behavior by its political allies, including Mr. Homan and New York Mayor Eric Adams. Accordingly, and pursuant to the House Judiciary Committee's jurisdiction over the DOJ and FBI, we demand that you provide the following to the Committee no later than 5:00 p.m., September 29, 2025:

1. All audio and video recordings and photographs documenting the meeting between FBI agents or FBI undercover employees and Mr. Homan, which occurred on or about September 20, 2024, including any recordings of Mr. Homan accepting money or discussing future federal contracts, and all audio and video recordings of any other meetings—telephonic, in person, or online—between Mr. Homan and any other individuals, that are in the possession of the FBI;
2. All communications between any employee at the White House and any employee at either DOJ or FBI regarding the decision to close the investigation into Mr. Homan;
3. The complete investigative file and subfiles from the U.S. Attorney's Office for the Western District of Texas, the Public Integrity Section, and the FBI related to Mr. Homan, including all FBI 302 interview reports, analytic products, legal analysis, prosecution memoranda, draft indictments or criminal complaints, and any other records that predicated the investigation into Mr. Homan;
4. All financial records of the cash disbursement and all paperwork related to the disbursement from the U.S. Attorney's Office and the FBI, including all approvals of cash payments signed off on by any FBI employees up to and including the FBI Special Agent in Charge and any FBI Headquarters personnel, as well as any approvals or notifications regarding the cash payments involving personnel from the DOJ and the U.S. Attorney's Office;
5. All communications between political appointees and career staff, including by Attorney General Bondi, Deputy Attorney General Blanche, Director Patel, and former acting Deputy Attorney General Bove, regarding the decision to close the investigation into Mr. Homan;
6. Documentation of any legal analysis used to justify closing the investigation despite recorded evidence of Mr. Homan accepting cash payments; and
7. Any ethics opinions or guidance provided regarding Mr. Homan's appointment as Border Czar while under federal investigation.

For documents responsive to the requests above in the possession of the FBI, please produce all emails on UNET, FBINET, and SCION pertaining to the case, as well as any Teams messages from UNET and Lync messages from FBINET. If you believe any of these materials

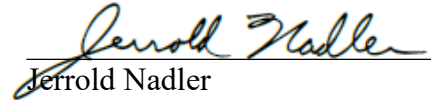
cannot be released for any reason, the Committee can arrange to view them *in camera* instead. This is a matter of profound public interest and urgency.

We look forward to your prompt compliance with these critical oversight requests.

Very truly yours,



Jamie Raskin
Ranking Member
House Committee on the Judiciary



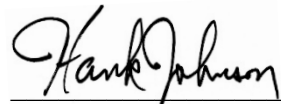
Jerrold Nadler
Member of Congress



Zoe Lofgren
Member of Congress




Steve Cohen
Member of Congress



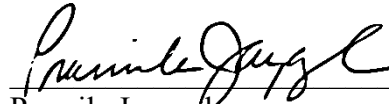
Henry C. "Hank" Johnson, Jr.
Member of Congress



Eric Swalwell
Member of Congress



Ted W. Lieu
Member of Congress



Pramila Jayapal
Member of Congress



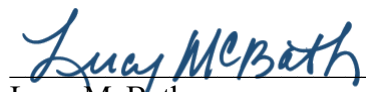
J. Luis Correa
Member of Congress



Mary Gay Scanlon
Member of Congress



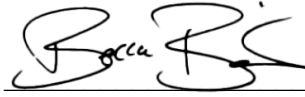
Joseph Neguse
Member of Congress



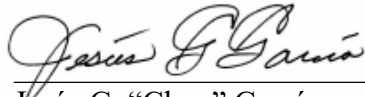
Lucy McBath
Member of Congress



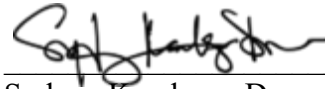
Deborah Ross
Member of Congress



Becca Balint
Member of Congress



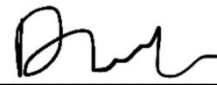
Jesús G. "Chuy" García
Member of Congress



Sydney Kamlager-Dove
Member of Congress



Jared Moskowitz
Member of Congress



Dan Goldman
Member of Congress



Jasmine Crockett
Member of Congress

cc: The Honorable Jim Jordan, Chairman