

ONE HUNDRED NINETEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON THE JUDICIARY

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December 12, 2025

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

Dear Attorney General Bondi:

We demand that you immediately produce to the Committee Volume II of Special Counsel Jack Smith's report, which details how President Donald Trump knowingly retained hundreds of presidential and highly classified records at his Mar-a-Lago club and then deliberately defied subpoenas, obstructed law enforcement, hid evidence, and lied about his continuing retention of these records.

Your Department of Justice (DOJ) has authorized Special Counsel Jack Smith to appear before the House Judiciary Committee for a closed-door deposition about his investigations into President Trump's unlawful conduct, including his decision to take, hide, and lie about documents containing some of our country's most sensitive secrets. We agree with your statement that "[t]he extraordinary events underlying this matter constitute exceptional circumstances warranting an extraordinary accommodation to Congress in this particular case."¹

Accordingly, it is baffling that you continue to refuse to produce Volume II of Special Counsel Smith's report detailing his findings from that same investigation. While claiming DOJ is willing to engage in "extraordinary accommodation," you continue to deprive Congress and the American people of the single most important and comprehensive account of that investigation, in clear violation of DOJ's consistent practice of publicly releasing reports of Special Counsel investigations.²

For the past ten months, you have suppressed Volume II of Special Counsel Smith's report with absolutely no justification. As we have repeatedly explained, the only basis your Department has ever articulated for withholding Volume II—and the only basis for Judge Aileen Cannon's January 2025 order enjoining its release—was protecting the fairness of the then-pending criminal proceedings against President Trump's two co-defendants, Walt Nauta and

¹ Authorization Letter from Patrick D. Davis, Assistant Att'y Gen., U.S. Dep't of Justice, to Lanny A. Bruer & Peter Koski (Nov. 12, 2025), at 3.

² *Id.*; see also n. 9, *infra*.

Carlos De Oliveira.³ But the Trump Department of Justice quickly dismissed the proceedings against Mr. Nauta and Mr. De Oliveria in February, *ten months ago*.⁴ For *ten months* you have had zero legal basis for withholding the report. Now you have authorized Mr. Smith to testify behind closed doors about the investigation that the report memorializes—while still refusing to produce the report itself.

That position is nonsensical. The report and Mr. Smith’s testimony concern exactly the same events: how President Trump came to retain hundreds of highly classified documents at his Mar-a-Lago club after he lost the 2020 election, why the President defied judicial subpoenas demanding their return, and how the President and his associates repeatedly obstructed law enforcement efforts to retrieve the documents.⁵ If Mr. Smith can discuss those matters under oath before Congress, then you can give his report about those matters to Congress. The report is an essential piece of Mr. Smith’s testimony and the Committee’s investigation: Members of Congress cannot meaningfully examine a witness about an investigation whose conclusions they have not been permitted to review.⁶

To the extent the Department maintains, contrary to all logic, that Judge Cannon’s order still somehow bars disclosure, you must seek judicial relief permitting disclosure in advance of the deposition. Your Department knows how to make such emergency applications when it chooses to. You repeatedly filed emergency petitions seeking authorization to disclose grand jury materials protected by Federal Rule of Criminal Procedure 6(e) that related to the Jeffrey Epstein sex trafficking ring—a far more stringent secrecy requirement than anything applicable here.⁷ If your Department was willing to seek permission to disclose Rule 6(e) materials, you clearly can seek permission to vacate an injunction whose sole justification disappeared ten months ago. Your failure to take this obvious step, even as the Eleventh Circuit has found “undue delay” by the district court, confirms that the district court’s order is a pretext rather than a genuine impediment.⁸

³ See Order Granting Defendants’ Emergency Motion, *United States v. Nauta*, Cr. No. 23-80101 (S.D. Fla. Jan. 21, 2025), at 11 (enjoining release of Volume II on the ground that the defendants’ “due process rights to a fair trial” would be “imperiled by public dissemination of Volume II”); see also Letter from the Hon. Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, et al., to the Hon. Pam Bondi, Att’y Gen., U.S. Dep’t of Justice (July 8, 2025); Letter from the Hon. Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, et al., to the Hon. James McHenry, Acting Att’y Gen., U.S. Dep’t of Justice (Feb. 2, 2025); Letter from the Hon. Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, et al., to the Hon. Merrick B. Garland, Att’y Gen., U.S. Dep’t of Justice (Jan. 15, 2025).

⁴ See Order of Dismissal, *United States v. Nauta*, Cr. No. 23-80101 (S.D. Fla. Feb. 11, 2025); Melissa Quinn & Robert Legare, *Court Formally Dismisses Case Against Trump’s Co-defendants in Mar-a-Lago Documents Probe*, CBS NEWS (Feb. 11, 2025), <https://www.cbsnews.com/news/trump-documents-case-walt-nauta-carlos-de-oliveira-case-dismissed>.

⁵ See Superseding Indictment, *United States v. Trump*, Cr. No. 23-80101 (S.D. Fla. July 27, 2023).

⁶ In none of our prior exchanges, nor in any communication with this Committee, has the Department invoked Judge Cannon’s order as a basis for refusing to produce the report.

⁷ See, e.g., Michael R. Sisak & Larry Neumeister, *Justice Department Renews Bid to Unseal Jeffrey Epstein and Ghislaine Maxwell Grand Jury Materials*, ASSOC. PRESS (Nov. 24, 2025), <https://apnews.com/article/justice-department-epstein-grand-jury-transcripts-441c932c63d726167c09f3ab813f68b5>.

⁸ See Order, *In re American Oversight*, No. 25-13400 (11th Cir. Nov. 3, 2025) (finding that petitioners demonstrated “undue delay” by the district court and effectively ordering the district court to resolve pending motions within 60 days).

Your predecessor publicly released every other special counsel report completed during his tenure: Special Counsel Robert Hur's report on President Biden, Special Counsel David Weiss's report on Hunter Biden, Special Counsel John Durham's report on the origins of the Federal Bureau of Investigation's investigation of links between Russian officials and President Trump's 2016 presidential campaign, and Volume I of Special Counsel Smith's report.⁹ There is no basis for treating Volume II differently. Your only reason for doing so is obvious: the report documents criminal conduct by your boss and former client.

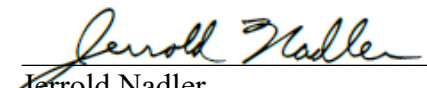
This Administration has repeatedly boasted that President Trump is "the most transparent and accessible president in American history."¹⁰ Your campaign to bury Mr. Smith's report makes a joke out of that claim. You are permitting prosecutors to be hauled before Congress to defend their work while denying Congress and the American public the written record that would explain it.

We demand that you produce Volume II to the House Judiciary Committee immediately. The American people have a right to know what Special Counsel Smith found. If you contend that any legal impediment prevents such production—a claim you have failed to assert in any of your communications with this Committee—we demand that you file an emergency petition with the district court seeking authorization for disclosure to Congress in advance of the deposition. The report has been completed for a year. The criminal proceedings that justified delay ended ten months ago.

Stop hiding the facts and produce the report so that the American people can judge for themselves whether President Trump violated the law and endangered our national security by stockpiling our nation's most sensitive secrets in the bathrooms of his golf club.


Very truly yours,


Jamie Raskin
Ranking Member

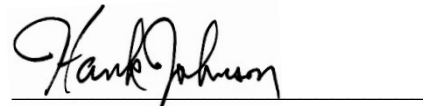

Jerrold Nadler
Member of Congress

⁹ Special Counsel Robert K. Hur, *Report on the Investigation Into Unauthorized Removal, Retention, and Disclosure of Classified Documents Discovered at Locations Including the Penn Biden Center and the Delaware Private Residence of President Joseph R. Biden, Jr.*, U.S. DEP'T OF JUSTICE (Feb. 5, 2024), <https://www.justice.gov/storage/report-from-special-counsel-robert-k-hur-february-2024.pdf>; Special Counsel David Weiss, *Report on the Investigation Into the Criminal Conduct of Robert Hunter Biden*, U.S. DEP'T OF JUSTICE (Jan. 10, 2025), <https://www.justice.gov/storage/Report-of-Special-Counsel-Weiss-January-2025.pdf>; Special Counsel John Durham, *Report on Matters Related To Intelligence Activities And Investigations Arising Out of the 2016 Presidential Campaigns*, U.S. DEP'T OF JUSTICE (May 12, 2023), <https://www.justice.gov/archives/media/1381211/dl>; Special Counsel Jack Smith, *Final Report on the Special Counsel's Investigations and Prosecutions Volume One: The Election Case, Report on Efforts to Interfere With the Lawful Transfer of Power Following the 2020 Presidential Election Or the Certification of the Electoral College Vote Held on January 6, 2021*, U.S. DEP'T OF JUSTICE (Jan. 7, 2025), <https://www.justice.gov/storage/Report-of-Special-Counsel-Smith-Volume-1-January-2025.pdf>.

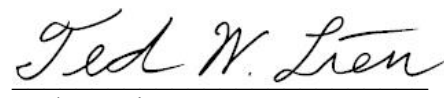
¹⁰ *Press Briefing by Press Secretary Karoline Leavitt*, THE WHITE HOUSE (Jan. 29, 2025), <https://www.whitehouse.gov/briefings-statements/2025/01/press-briefing-by-press-secretary-karoline-leavitt/>.



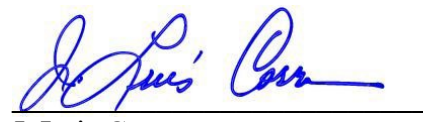
Zoe Lofgren
Member of Congress



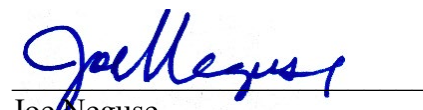
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Ted W. Lieu
Member of Congress



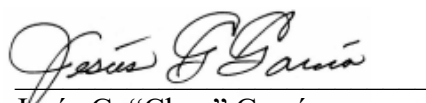
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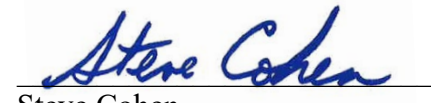
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Deborah Ross
Member of Congress



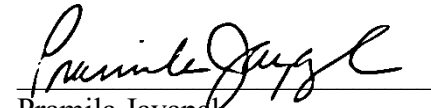
Jesús G. "Chuy" García
Member of Congress




Steve Cohen
Member of Congress



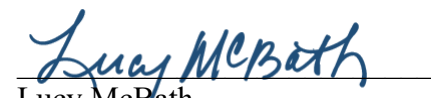
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Member of Congress



Pramila Jayapal
Member of Congress



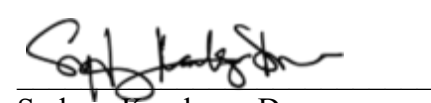
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Sydney Kamlager-Dove
Member of Congress



Jared Moskowitz
Member of Congress



Dan Goldman
Member of Congress



Jasmine Crockett
Member of Congress

cc: The Honorable Jim Jordan, Chairman