

# Congress of the United States

Washington, DC 20515

December 8, 2025

Joseph V. Cuffari  
Inspector General  
U.S. Department of Homeland Security  
245 Murray Lane SW  
Washington, D.C. 20528

Steven A. Stebbins  
Acting Inspector General  
U.S. Department of Defense  
4800 Mark Center Drive  
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Dear Inspector General Cuffari and Acting Inspector General Stebbins:

President Trump's plans to deport millions of non-violent immigrants have ushered in a "gold rush" for private contractors that provide immigration detention, surveillance, and deportation services.<sup>1</sup> The influx of \$170 *billion* in new immigration enforcement and border militarization funding through Trump's "Big Beautiful Bill" has resulted in a historic transfer of taxpayer dollars to immigration contractors.<sup>2</sup>

We are concerned that some contractors are potentially receiving lucrative, no-bid contracts because of their close ties to high-level Trump administration officials. Notably, President Trump's "Border Czar" Tom Homan previously ran a firm that helped contractors secure homeland security contracts and, now from inside the government, may be helping his former clients secure federal contracts. Before the election, he allegedly accepted \$50,000 in cash in a Cava bag in exchange for the promise that, if President Trump took office, Mr. Homan would help certain companies win contracts.<sup>3</sup> Since entering government, Mr. Homan reportedly has participated in meetings with immigration contractors about contracts, potentially in violation of ethics rules, and some companies with ties to Mr. Homan have been short-listed to compete for lucrative contracts.<sup>4</sup>

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<sup>1</sup> PBS News, "Trump administration using no-bid contracts, boosting big firms, to get more ICE detention beds," Heather Hollingsworth and John Hanna, June 16, 2025, <https://www.pbs.org/newshour/nation/trump-administration-using-no-bid-contracts-boosting-big-firms-to-get-more-ice-detention-beds>.

<sup>2</sup> The Atlantic, "ICE's Mind-Bogglingly Massive Blank Check," Caitlin Dickerson, July 31, 2025, <https://www.theatlantic.com/politics/archive/2025/07/ice-budget-immigration-enforcement/683678/>; The Intercept, "The Private Prison Industry Looks Forward to Soaring Profits Thanks to Trump's Budget," Matt Sledge, July 10, 2025, <https://theintercept.com/2025/07/10/corecivic-trump-big-beautiful-bill/>; American Immigration Council, "What's in the Big Beautiful Bill? Immigration and Border Security Unpacked," July 14, 2025, <https://www.americanimmigrationcouncil.org/fact-sheet/big-beautiful-bill-immigration-border-security/>.

<sup>3</sup> MSNBC, "Tom Homan was investigated for accepting \$50,000 from undercover FBI agents. Trump's DOJ shut it down," Carol Leonnig and Ken Dilanian, Sept. 20, 2025, <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>; The New Republic, "Tom Homan Suddenly Changes His Story on That \$50,000 Cash Bribe," Malcolm Ferguson, October 16, 2025, <https://newrepublic.com/post/201852/tom-homan-50000-cash-bribe>.

<sup>4</sup> Bloomberg, "Trump's Border Czar Involved in Detention Contract Talks Despite Recusal," Fola Akinnibi, Rachel Adams-Heard, and Sophie Alexander, September 24, 2025, <https://www.bloomberg.com/news/features/2025-09-24/trump-s-border-czar-tom-homan-involved-in-detention-contract-talks>; Mother Jones, "Border Czar's Former Clients Cash in on Trump's Immigration Crackdown," Dan Friedman, Russ Choma, and Nick Schwellenbach, December 5, 2025,

But Mr. Homan is not the only senior official with ties to immigration contractors. Several top officials crafting the administration's immigration policies appear to have financial and professional ties to the private contractors profiting from the system they are helping create — including through stock investments, past lobbying and employment backgrounds, and campaign contributions.<sup>5</sup> These ties not only foster potential corruption but further weaken public faith in a contracting system that has previously enabled serious civil rights abuses.<sup>6</sup>

To ensure that federal contracts are free from conflicts of interest and above reproach, we ask that the Department of Homeland Security (DHS) and Department of Defense (DoD) Offices of Inspector General investigate the nature of the ties between DHS and DoD immigration contractors and Trump officials, whether officials have improperly assisted such companies in securing government contracts, and whether they have bypassed the standard procurement process to do so.

### **Private Contractors are Profiting from President Trump's Immigration Policies**

Numerous private contractors are experiencing a historic windfall due to the Administration's immigration enforcement system, including through the following channels:

- ***Detention:*** Immigration detention is increasingly privatized, with over 90 percent of detention beds managed by private companies, up from 81 percent at the end of the first Trump Administration.<sup>7</sup> Two companies, CoreCivic and GEO Group, dominate the immigration detention market and make roughly a third of their revenue from contracts with Immigration and Customs Enforcement (ICE).<sup>8</sup> And now, the Trump Administration is paying contractors to detain immigrants on military bases.<sup>9</sup> For example, one company, Disaster Management Group, will be paid a “substantial chunk of the more than \$1.2 billion”

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<https://www.motherjones.com/politics/2025/12/tom-homan-trump-border-patrol-ice-immigration/>.

<sup>5</sup> Project On Government Oversight, “Stephen Miller’s Financial Stake in ICE Contractor Palantir,” Nick Schwellenbach, June 24, 2025, <https://www.pogo.org/investigations/stephen-miller-conflicts-of-interest>; Miami Herald, “Florida’s GEO Group plays central role in Trump’s mass deportation plan,” Shirsho Dasgupta, October 5, 2025, <https://www.miamiherald.com/news/local/immigration/article312211888.html>; ABC News, “Lobbying firm with close ties to Trump is poised to profit from new administration, experts say,” Peter Charalambous and Laura Romero, December 4, 2024, <https://abcnews.go.com/US/lobbying-firm-close-ties-trump-poised-profit-new/story?id=116417198>.

<sup>6</sup> New York Times, “Concerns Grow Over Dire Conditions in Immigrant Detention,” Miriam Jordan and Jazmine Ulloa, June 28, 2025, <https://www.nytimes.com/2025/06/28/us/immigrant-detention-conditions.html>.

<sup>7</sup> ACLU, “Unchecked Growth: Private Prison Corporations and Immigration Detention, Three Years Into the Biden Administration,” Eunice Hyunhye Cho, August 7, 2023, <https://www.aclu.org/news/immigrants-rights/unchecked-growth-private-prison-corporations-and-immigration-detention-three-years-into-the-biden-administration>.

<sup>8</sup> *Id.*

<sup>9</sup> Politico, “Trump allies circulate mass deportation plan calling for ‘processing camps’ and a private citizen ‘army,’” Dasha Burns and Myah Ward, February 25, 2025, <https://www.politico.com/news/2025/02/25/documents-military-contractors-mass-deportations-022648>; CNN, “Looking to speed up building network of migrant detention centers, Trump administration turns to the US Navy,” Natasha Bertrand and Priscilla Alvarez, October 24 2025, <https://www.cnn.com/2025/10/24/politics/navy-building-ice-detention-facilities>; New York Times, “Trump Administration Aims to Spend \$45 Billion to Expand Immigrant Detention,” Allison McCann, Alexandra Berzon, and Hamed Aleaziz, April 7, 2025, <https://www.nytimes.com/2025/04/07/us/politics/trump-administration-immigrant-detention-facilities-services.html>.

allocated for detention at the Fort Bliss military base.<sup>10</sup> CoreCivic has also said that it is “very capable” of executing the Administration’s vision of detention on “military reservations around the country.”<sup>11</sup>

- **Deportation flights:** To operate deportation flights, ICE Air Operations contracts with the company CSI Aviation,<sup>12</sup> which in turn subcontracts with several airlines, including Avelo Airlines and GlobalX Air.<sup>13</sup>
- **Surveillance:** Several companies provide DHS with surveillance technology and data-analysis services. For example, the software giant Palantir for years has helped ICE determine the identities and locations of immigrants to target for arrests and deportation, but is seeing an increased influx in cash during this Administration.<sup>14</sup> Meanwhile, the “Big Beautiful Bill” contained an obscure provision that essentially established defense contractor Anduril as the only possible recipient of a major contract; under that provision, Customs and Border Protection (CBP) will pay Anduril over *\$6 billion* to construct data surveillance towers.<sup>15</sup> Furthermore, contractors that supply ankle monitors and other electronic surveillance devices, such as GEO Group’s subsidiary BI Incorporated, also stand to profit — particularly as ICE directs its agents to “sharply increase the number of immigrants they shackle with GPS-enabled ankle monitors.”<sup>16</sup>

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<sup>10</sup> ProPublica, “His Former Company Got Caught Employing Undocumented Workers. Now He’s Profiting Off an Immigrant Detention Camp,” Avi Asher-Schapiro and Jeff Ernsthausen, July 25, 2025, <https://www.propublica.org/article/nathan-albers-fort-bliss-immigration>.

<sup>11</sup> Roic AI, CoreCivic, Inc. Q1 2025 Earnings Call Transcript, May 8, 2025, <https://www.roic.ai/quote/CXW/transcripts/2025/1>.

<sup>12</sup> U.S. General Services Administration, Limited Source Justification for Chartered Flights, February 27, 2025, <https://sam.gov/opp/a532873313ff4de8848e913d152e658d/view>; Project on Government Oversight, “Meet the ICE Contractor Running Deportation Flights,” Nick Schwellenbach, March 20, 2025, <https://www.pogo.org/investigations/meet-the-ice-contractor-running-deportation-flights>.

<sup>13</sup> GEO Group Inc., “The GEO Group Announces Five-Year Contract to Provide Air Operations Support Services for U.S. Immigration and Customs Enforcement,” March 12, 2024, <https://investors.geogroup.com/news-releases/news-release-details/geo-group-announces-five-year-contract-provide-air-operations>; Al Jazeera, “Houston-based Avelo Airlines faces backlash for deportation flights,” Andy Hirschfeld, May 28, 2025, <https://www.aljazeera.com/economy/2025/5/28/houston-based-avelo-airlines-faces-backlash-for-deportation-flights>; Tucson Sentinel, “Which air carriers are positioned to benefit from increased deportations?,” Indy Scholtens, May 14, 2025, [https://www.tucsonsentinel.com/nationworld/report/051425\\_carrier\\_deportations/which-air-carriers-are-positioned-benefit-from-increased-deportations/](https://www.tucsonsentinel.com/nationworld/report/051425_carrier_deportations/which-air-carriers-are-positioned-benefit-from-increased-deportations/).

<sup>14</sup> 404 Media, “Leaked: Palantir’s Plan to Help ICE Deport People,” Joseph Cox, April 17, 2025, <https://www.404media.co/leaked-palantirs-plan-to-help-ice-deport-people/>; Wired, “ICE Is Paying Palantir \$30 Million to Build ‘ImmigrationOS’ Surveillance Platform,” Caroline Haskins, April 18, 2025, <https://www.wired.com/story/ice-palantir-immigrationos/>; The Guardian, “Documents offer rare insight on ICE’s close relationship with Palantir,” Johana Bhuiyan, September 22, 2025, <https://www.theguardian.com/us-news/ng-interactive/2025/sep/22/ice-palantir-data>.

<sup>15</sup> The Intercept, “Trump’s Big Beautiful Gift to Anduril,” Sam Biddle, July 9, 2025, <https://theintercept.com/2025/07/09/trump-big-beautiful-bill-anduril/>.

<sup>16</sup> Washington Post, “ICE moves to shackle some 180,000 immigrants with GPS ankle monitors,” Douglas MacMillan and Silvia Foster-Frau, July 24, 2025, <https://www.washingtonpost.com/immigration/2025/07/24/ice-check-in-ankle-monitor-immigrants/>; Letter from Senator Elizabeth Warren, et al., to GEO Group CEO Brian R. Evans, et al., July 26, 2024, [https://www.warren.senate.gov/imo/media/doc/warren\\_cardenas\\_letter\\_to\\_bi\\_incorporated\\_072624.pdf](https://www.warren.senate.gov/imo/media/doc/warren_cardenas_letter_to_bi_incorporated_072624.pdf).

- **Arrests:** Perhaps most concerning, the Trump Administration is reportedly considering a novel plan to outsource immigration arrests to private contractors. Erik Prince, former CEO of Blackwater (now rebranded “ACADEMI”) — the military contractor infamous for its role in the 2007 massacre of civilians in Iraq<sup>17</sup> — has proposed that the Trump Administration pay his new company 2USV to create a “private citizen ‘army’” of up to 100,000 employees to arrest immigrants.<sup>18</sup> ACADEMI has similarly pitched high-level Administration officials on plans to transport ten thousand migrants to El Salvador and avoid American due process protections by designating part of the infamous CECOT prison as American soil.<sup>19</sup>

For these contractors, President Trump’s second term has been enormously lucrative. Soon after the 2024 election, private detention contractors’ stock values skyrocketed.<sup>20</sup> Earlier this year, CoreCivic proudly announced: “Never in our 42-year company history have we had so much activity and demand for our services as we are seeing right now.”<sup>21</sup> In 2025, the company informed shareholders that its “first quarter revenue of \$488.6 million exceeded our expectations,” and it expects to activate “idle facilities” to meet ICE’s demand.<sup>22</sup> Similarly, during a 2025 earnings call with shareholders, GEO Group reported that it had entered new

<sup>17</sup> PBS News, “How the Blackwater pardons could have a lasting impact: ‘The Americans got away with it,’” Ali Rogin, December 23, 2020, <https://www.pbs.org/newshour/world/how-the-blackwater-pardons-could-have-a-lasting-impact-the-americans-got-away-with-it/>; Politico, “Trump appears open to using private forces to help deport millions of undocumented immigrants,” Myah Ward, February 27, 2025, <https://www.politico.com/news/2025/02/27/trump-private-forces-immigration-00206560>.

<sup>18</sup> The Hill, “Think Trump’s deportations have been bad? Wait until his civilian army gets started,” Brandon Bolte and Isabel Skinner, June 2, 2025, <https://thehill.com/opinion/immigration/5325548-erik-prince-paramilitary-proposal-immigration/>; Politico, “Trump allies circulate mass deportation plan calling for ‘processing camps’ and a private citizen ‘army,’” Dasha Burns and Myah Ward, February 25, 2025, <https://www.politico.com/news/2025/02/25/documents-military-contractors-mass-deportations-022648>.

<sup>19</sup> Politico, “Military contractors pitch unprecedented prison plan for detained immigrants,” Dasha Burns and Myah Ward, April 11, 2025, <https://www.politico.com/news/2025/04/11/military-contractors-prison-plan-detained-immigrants-erik-prince-00287208>; La Voce di New York, “Military Contractors Propose El Salvador’s CECOT Prison Becomes U.S. Territory,” Emanuele La Prova, April 12, 2025, <https://lavocedinyork.com/en/news/2025/04/12/military-contractors-propose-el-salvadors-cecot-prison-becomes-u-s-territory/>.

<sup>20</sup> Fortune, “Trump’s election win sends private prisons stocks soaring as investors anticipate hard crackdown on migration,” Christiaan Hetzner, November 7, 2024, <https://fortune.com/2024/11/07/president-donald-trump-election-immigration-border-detention-ice-geo-group-corecivic/>; Forbes, “The Stocks Are Outperforming Tesla As The Biggest Trump Trade Winners,” Derek Saul, November 11, 2024, <https://www.forbes.com/sites/dereksaul/2024/11/11/these-stocks-are-outperforming-tesla-as-the-biggest-trump-trade-winners/>.

<sup>21</sup> Wall Street Journal, “Private Prisons Count on ‘Big Beautiful Bill’ for Immigration Payday,” Victoria Albert and Elizabeth Findell, May 8, 2025, <https://www.wsj.com/politics/policy/private-prisons-count-on-big-beautiful-bill-for-immigration-payday-b3912262?>.

<sup>22</sup> S&P Global Market Intelligence, “CoreCivic, Inc. NYSE:CXW FQ1 2025 Earnings Call Transcripts,” May 8, 2025, p. 4, on file with the Office of Senator Elizabeth Warren; Quiver Quantitative, “CoreCivic, Inc. Reports Strong First Quarter 2025 Financial Results and Increases Annual Guidance,” May 7, 2025, [https://www.globenewswire.com/news-release/2025/05/07/3076627/0/en/CoreCivic-Reports-First-Quarter-2025-Financial-Results.html](https://www.quiverquant.com/news/CoreCivic%2C+Inc.+Reports+Strong+First+Quarter+2025+Financial+Results+and+Increases+Annual+Guidance#:~:text=Quiver%20AI%20Summary,in%20the%20correctional%20services%20sector; Global Newswire, CoreCivic Reports First Quarter 2025 Financial Results, May 7, 2025, <a href=).

contracts worth over \$130 million with ICE, and it anticipated that increased detention “could generate between \$500 million and \$600 million” for the company each year, while increased deportation flights would mean yet another \$40 million to \$50 million each year.<sup>23</sup> Given these “unprecedented business opportunities,” GEO recently boosted the multi-million-dollar compensation of its top executives.<sup>24</sup> Likewise, surveillance and deportation flight contractors have profited; for example, since the beginning of 2025, Palantir has seen its stock value increase by a whopping 80 percent, and GlobalX Air’s stock has risen by almost 40 percent.<sup>25</sup>

### **Trump Administration Officials Appear to Have Improper Ties to the Immigration Contractors That Are Profiting**

The conflicts of interest posed by this windfall are substantial, unprecedented, and worthy of serious investigation. Such ties create at least the appearance that federal contracts are potentially being awarded on the basis of personal relationships rather than federally mandated contracting procedures. Examples of companies with financial and personal ties to the Trump Administration include:

- **GEO Group:** Numerous high-profile U.S. officials have ties to GEO Group, a top federal detention contractor. Tom Homan, the President’s Border Czar, worked as a paid consultant for GEO Group prior to joining the government, has called for expanding ICE’s detention capacity to “at least 100,000 beds,” and has seemingly failed to honor his promise to recuse himself from contracting decisions—with his former colleagues reportedly “trading on Tom Homan.”<sup>26</sup> Given that Mr. Homan reportedly accepted \$50,000 cash in exchange for a promise for future immigration-related contracts, we have substantial concerns that Mr. Homan has not followed ethical best practices and may have intervened on behalf of his former client. Meanwhile, David Venturella recently departed his role as a Vice President at GEO Group to become a top ICE official overseeing immigration detention centers like those run by GEO; Mr. Venturella reportedly even received a waiver to work on matters involving GEO Group.<sup>27</sup>

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<sup>23</sup> S&P Global Market Intelligence, “The GEO Group, Inc. NYSE:GEO FQ1 2025 Earnings Call Transcripts,” May 7, 2025, p. 5, on file with the Office of Senator Elizabeth Warren.

<sup>24</sup> United States Securities And Exchange Commission, Form 8-K for GEO Group INC filed 07/10/2025, July 10, 2025, <https://investors.geogroup.com/static-files/5520606c-df51-4bf2-8331-d500c3a4e798>; Justia, Amendment to Executive Chairman Employment Agreement between George C. Zoley and The GEO Group, Inc., July 7, 2025, <https://contracts.justia.com/companies/geo-group-inc-578/contract/1332941/>; Justia, Executive Employment Agreement between The GEO Group, Inc. and J. David Donahue (CEO), January 1, 2025, <https://contracts.justia.com/companies/geo-group-inc-578/contract/1306401/>.

<sup>25</sup> Bloomberg, “Airline at Center of Brazil Fiasco Key to Trump’s Deportations,” Michael D McDonald, February 1, 2025, <https://www.bloomberg.com/news/articles/2025-02-01/airline-at-center-of-brazil-fiasco-key-to-trump-s-deportations>; Motley Fool. “How Palantir Stock Soared 80% in the First Half of 2025 to Become the Best S&P 500 Stock -- and Why the Next Big Move Could Come in August,” Beth McKenna, July 3, 2025, <https://www.fool.com/investing/2025/07/03/best-stocks-2025-pltr-stock-ai-stocks/>.

<sup>26</sup> ProPublica, Trading on Tom Homan: Inside the Push to Cash in on the Trump Administration’s Deportation Campaign, October, 1, 2025, <https://www.propublica.org/article/tom-homan-border-czar-trump-mark-hall-charles-sowell>; Washington Post, “Trump’s border czar earned consulting fees from immigrant detention firm,” May 27, 2025, <https://www.washingtonpost.com/business/2025/05/27/border-czar-ethics-consulting-fees/>.

<sup>27</sup> Project on Government Oversight, “Private Prison Giant Hired ICE Detention Chief,” Nick Schwellenbach and Rene Kladzyk, January 17, 2025, <https://www.pogo.org/investigations/private-prison-giant-hired-ice-detention->

- **Palantir:** Palantir offers data services for ICE to identify and target immigrants, and as the company secures immigration contracts, it appears to have both personal and financial ties to the Administration. The OMB’s Federal Chief Information Officer Gregory Barbaccia is a former Palantir employee who reportedly “call[s] himself the first ‘federal chief artificial intelligence officer,’”<sup>28</sup> and it is unclear whether he may have played a role in Palantir obtaining DHS’s single-sourced contract to provide the AI-based ImmigrationOS system that will reportedly track immigrants’ movements—as well as other Palantir contracts.<sup>29</sup> Stephen Miller, President Trump’s Deputy Chief of Staff and architect of the White House’s immigration enforcement agenda, holds between \$100,000 and \$250,000 worth of stock in Palantir. Mr. Miller’s senior policy advisor Kara Frederick similarly owns between \$50,000 and \$100,000 in Palantir stock.<sup>30</sup> For Palantir’s part, both the company and its executives and founders have donated to benefit President Trump; for example, the company is a donor to the White House ballroom and its CEO donated to President Trump’s campaign.<sup>31</sup>
- **Blackwater aka ACADEMI:** Defense contractor and ACADEMI founder Erik Prince has sought a role in immigration arrests and detentions,<sup>32</sup> yet has conflicts of interests that could make any role in federal contracting or immigration detention appear improper. Beyond Mr. Prince’s close relationship with Defense Secretary Hegseth and a donation to President Trump’s Inaugural Fund from a company apparently linked to Mr. Prince,<sup>33</sup> Mr. Prince routinely signs contracts with foreign governments including Haiti, the Democratic Republic of the Congo, and Ecuador, and is seeking contracts elsewhere, meaning secure U.S. facilities

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chief; Washington Post, “The former private prison exec behind ICE’s immigrant detention surge,” Douglas MacMillan and Aaron Schaffer, August 1, 2025, <https://www.washingtonpost.com/business/2025/08/01/ice-david-venturella-geo-immigration-detention/>.

<sup>28</sup> Project on Government Oversight, “Gold Rush: Top Trump Officials’ Silicon Valley Ties,” August 25, 2025, <https://www.pogo.org/investigations/gold-rush-top-trump-officials-silicon-valley-ties>.

<sup>29</sup> Business Insider, “ICE just ordered \$30 million worth of new technology from Palantir to track immigrants,” Rosemarie Ho, April 17, 2025, <https://www.businessinsider.com/ice-palantir-new-technology-30-million-visa-overstays-self-deportation-2025-4>.

<sup>30</sup> Project on Government Oversight, “Stephen Miller’s Financial Stake in ICE Contractor Palantir,” Nick Schwellenbach, June 24, 2025, <https://www.pogo.org/investigations/stephen-miller-conflicts-of-interest>; Wired, “ICE Is Paying Palantir \$30 Million to Build ‘ImmigrationOS’ Surveillance Platform,” Caroline Haskins, April 18, 2025, <https://www.wired.com/story/ice-palantir-immigrationos/>.

<sup>31</sup> CBS News, “Who’s paying for the White House ballroom and what’s in it for them,” September 19, 2025 <https://www.cbsnews.com/news/trump-white-house-ballroom-donor-names/>; The Denver Post, “Colorado’s most valuable company is among donors for Trump’s White House ballroom,” Seth Klamann, October 24, 2025, <https://www.denverpost.com/2025/10/24/colorado-donald-trump-palantir/>.

<sup>32</sup> Politico, “Military contractors pitch unprecedented prison plan for detained immigrants,” Dasha Burns and Myah Ward, April 11, 2025, <https://www.politico.com/news/2025/04/11/military-contractors-prison-plan-detained-immigrants-00287208>.

<sup>33</sup> Brennan Center, “Million-Dollar Donors Flooded Trump’s Second Inauguration,” Anna Massoglia, July 1, 2025, <https://www.brennancenter.org/our-work/research-reports/million-dollar-donors-flooded-trumps-second-inauguration>; CNN, “The return of Erik Prince: How a notorious military contractor maneuvered his way back inside Trump’s orbit,” March 13, 2025, <https://www.cnn.com/2025/03/13/politics/erik-prince-return-maneuvered-inside-trump-orbit>.

and pseudo-military operations could be run by a former “mercenary” with explicit defense ties to foreign governments.<sup>34</sup>

- **Anduril:** There appear to exist numerous concerning ties between the Trump Administration and Anduril. For example, Trae Stephens, Anduril’s co-founder and executive chairman, has been a Trump donor, served on President Trump’s first transition team, and was considered for senior Administration posts.<sup>35</sup> Michael Obadal, President Trump’s Under Secretary of the Army, worked at Anduril until June 2025 and reportedly he originally refused to divest from his stock in the company.<sup>36</sup>
- **CoreCivic, CSI Aviation, CDR Companies:** CoreCivic, which like GEO Group has benefited from the skyrocketing demand for detention facilities, donated significantly to both President Trump’s campaign and Inaugural Fund.<sup>37</sup> Meanwhile, CSI Aviation’s corporate leadership have collectively given about \$840,000 to Trump-aligned political action committees, and hosted a rally for the President.<sup>38</sup> CDR Companies gave nearly \$1 million to support Trump’s 2024 campaign and 2025 inauguration and was chosen to provide medical services at the costly “Alligator Alcatraz” detention camp in Florida.<sup>39</sup>

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<sup>34</sup> The Economist, “The return of Erik Prince,” November 1, 2025, <https://www.economist.com/podcasts/2025/11/01/the-return-of-erik-prince>; CNN, “The return of Erik Prince: How a notorious military contractor maneuvered his way back inside Trump’s orbit,” March 13, 2025, <https://www.cnn.com/2025/03/13/politics/erik-prince-return-maneuvered-inside-trump-orbit>; NPR, “Blackwater founder to deploy nearly 200 personnel to Haiti as gang violence soars,” August 15, 2025, <https://www.npr.org/2025/08/15/nx-s1-5503316/blackwater-erik-prince-haiti-gang-violence>; Reuters, “Exclusive: Trump supporter Prince reaches deal with Congo to help secure mineral wealth,” Jessica Donati and Sonia Rolley, April 17, 2025, <https://www.reuters.com/world/trump-supporter-prince-reaches-deal-with-congo-help-secure-mineral-wealth-2025-04-17/>.

<sup>35</sup> New York Times, “Trump Boosters Expect Big Returns on Their Investment: ‘The Shackles Are Off,’” Eric Lipton, November 17, 2024, <https://www.nytimes.com/2024/11/17/us/politics/trump-presidency-billionaires.html>; New York Times, “A.I. Military Start-Up Anduril Close to Deal That Would Value It at \$28 Billion,” February 7, 2025, <https://www.nytimes.com/2025/02/07/technology/anduril-funding-valuation-28-billion.html>; Responsible Statecraft, “Thiel pal and venture capitalist eyed for 2<sup>nd</sup> highest post in Pentagon,” Stavroula Pabst, November 27, 2024, <https://responsiblestatecraft.org/trae-stephens-trump/>; Forbes, “Mega Funding Round Makes Anduril Cofounder A Billionaire,” David Jeans and Phoebe Liu, June 10, 2025, <https://www.forbes.com/sites/davidjeans/2025/06/10/trae-stephens-anduril-billionaire/>.

<sup>36</sup> The Intercept, “Trump’s Big Beautiful Gift to Anduril,” July 9, 2025, <https://theintercept.com/2025/07/09/trump-big-beautiful-bill-anduril/>.

<sup>37</sup> Citizens for Responsibility and Ethics in Washington, “Trump’s budget bill benefits private immigration detention companies that donated to Trump,” Katherine Culliton-Gonzalez and Lama Elsharif, July 23, 2025, <https://www.citizensforethics.org/reports-investigations/crew-investigations/trumps-budget-bill-benefits-private-immigration-detention-companies-that-donated-to-trump/>.

<sup>38</sup> Project on Government Oversight, “Meet the ICE Contractor Running Deportation Flights,” March 20, 2025, <https://www.pogo.org/investigations/meet-the-ice-contractor-running-deportation-flights>; Tucson Sentinel, “Which air carriers are positioned to benefit from increased deportations?,” Indy Scholtens, May 14, 2025, [https://www.tucsonsentinel.com/nationworld/report/051425\\_carrier\\_deportations/which-air-carriers-are-positioned-benefit-from-increased-deportations/](https://www.tucsonsentinel.com/nationworld/report/051425_carrier_deportations/which-air-carriers-are-positioned-benefit-from-increased-deportations/).

<sup>39</sup> Miami Herald, “Contractors building Alligator Alcatraz have donated money to Florida GOP, DeSantis,” Alexandra Glorioso, Romy Ellenbogen, and Lawrence Mower, July 4, 2025, <https://www.miamiherald.com/news/politics-government/state-politics/article309886225.html#storylink=cpy>; Rolling Stone, “Republican Donors Cash In on ‘Alligator Alcatraz’ Immigrant Camp,” Anderw Perez and Nikki McCann Ramirez, July 1, 2025, <https://www.rollingstone.com/politics/politics-features/trump-desantis-donors->

- **Strategy Group:** Strategy Group is an advertising company that won a DHS contract to publicize the Trump Administration’s anti-immigration messaging, and DHS awarded the contract by “bypassing the normal competitive bidding process designed to prevent waste and corruption.”<sup>40</sup> The company has multiple ties to top DHS officials; it worked on Secretary Kristi Noem’s 2022 gubernatorial campaign and, reportedly, “[n]o firm has closer ties to Noem’s political operation than the Strategy Group.”<sup>41</sup> DHS’s spokesperson, Tricia McLaughlin, is also married to the company’s CEO<sup>42</sup> — meaning that DHS just delivered taxpayer funds directly to the household of its chief spokesperson without going through the usual contracting process. Furthermore, Strategy Group’s owner is a former colleague of Corey Lewandowski, DHS’s “de facto chief of staff” who reportedly has been given “veto power over DHS contracts,”<sup>43</sup> and who similarly has ties to another advertising company that recently won a fast-tracked DHS contract.<sup>44</sup>

These are just select examples of immigration-related contractors with concerning personal, professional, and financial ties to Trump Administration officials.

### **The DoD and DHS OIGs Should Investigate Potential Conflicts of Interest and Undue Influence on Policy and Contracting Decisions**

These circumstances raise serious concerns about conflicts of interest within DHS and DoD, and the extent to which those conflicts may be influencing the federal government’s immigrant detention policies. When Executive Branch officials determining immigration policy have a personal stake in their decision-making, they may be improperly influenced to enact policies that generate billions for their favored immigration contractors. These apparent conflicts of interest risk the further erosion of public confidence in DoD and DHS at a time when taxpayer dollars are being funneled toward ICE practices that are increasingly regarded as inhumane.

It is your offices’ responsibility to investigate violations of federal conflict-of-interest laws, including 18 U.S.C. § 208 and associated regulations,<sup>45</sup> which direct employees not to participate in particular matters in which they or someone with whom they have a “covered relationship” — including recent and prospective employers — have a financial interest.<sup>46</sup> We ask that your investigation address the following questions:

[alligator-alcatraz-immigrant-camp-1235376856/](#)

<sup>40</sup> ProPublica, “Firm Tied to Kristi Noem Secretly Got Money From \$220 Million DHS Ad Contracts,” Justin Elliott, Joshua Kaplan and Alex Mierjeski, November 14, 2025, <https://www.propublica.org/article/kristi-noem-dhs-ad-campaign-strategy-group>.

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*; Politico, “Lewandowski’s veto power over DHS contracts frustrates admin officials: ‘Corey is part of the problem,’” Myah Ward and Zack Colman, August 27, 2025, <https://www.politico.com/news/2025/08/27/tk-00527043>; Wall Street Journal, “How Corey Lewandowski Became Kristi Noem’s Gatekeeper at DHS,” Tarini Parti, Michelle Hackman, Josh Dawsey, Jack Gillum, April 17, 2025, <https://www.wsj.com/politics/policy/how-corey-lewandowski-became-kristi-noems-gatekeeper-at-dhs-6c08d996>.

<sup>44</sup> Wall Street Journal, “How Corey Lewandowski Became Kristi Noem’s Gatekeeper at DHS,” Tarini Parti, Michelle Hackman, Josh Dawsey, Jack Gillum, April 17, 2025, <https://www.wsj.com/politics/policy/how-corey-lewandowski-became-kristi-noems-gatekeeper-at-dhs-6c08d996>.

<sup>45</sup> See, e.g., 5 C.F.R. § 2635.402, and 5 C.F.R. § 2635.502.

<sup>46</sup> 18 U.S.C. § 208; 5 C.F.R. § 2635.402; 5 C.F.R. § 2635.502.



1. Have Tom Homan or any other Trump administration officials participated in particular matters related to immigration contracting involving their former clients?
  - a. Have any Trump officials recused under 18 U.S.C. § 208 from matters involving immigration-related contractors?
  - b. Have any Trump officials received ethics waivers under 18 U.S.C. § 208(b) to work on matters involving their former clients?
2. Have any Trump Administration officials with any other financial or personal ties to any immigration-related contractors taken part in any decisions or discussions affecting the awarding of such contracts?
  - a. For example, have Gregory Barbaccia, Stephen Miller, Kara Frederick, or other Trump Administration officials with financial or personal ties to Palantir taken part in any decisions or discussions affecting the awarding of a contract to Palantir?
  - b. Have Gregory Barbaccia, Michael Obadal, or other Trump Administration officials with financial or personal ties to Anduril taken part in any decisions or discussions affecting the awarding of a contract to Anduril?
3. Do officials at your agencies have financial, professional, personal, or campaign finance-related connections to immigration-related contractors that present potential conflicts of interest?
  - a. If so, please describe the scope and nature of these conflicts among agency staff.
  - b. Do any of those conflicts — regardless of whether they violate current law — affect the efficiency and integrity of federal programs?
4. How do agency ethics officials determine whether officials' financial, professional, personal, or campaign finance-related connections to immigration-related contractors create a conflict of interest or otherwise violate federal ethics laws?
5. Have officials at your agency violated federal conflict-of-interest rules as a result of their financial, professional, personal, or campaign finance-related connections to immigration-related contractors?
  - a. Have there been any investigations into such potential violations or relevant findings?
6. Are federal ethics rules and the implementation of these rules by agency officials adequate? Specifically, are there cases in which agency officials' financial, professional, personal, or campaign finance-related connections to immigration-related contractors create conflicts of interest or appear to create such conflicts, despite the fact that they do not appear to violate current federal or agency-level rules and regulations?

7. Have any immigration-related contracts bypassed the standard bidding process since January 20, 2025? If so, did conflicts of interest have any potential influence over the outcome of these contracts?

Thank you for your attention to this important matter.

Sincerely,



Elizabeth Warren  
United States Senator



Jamie Raskin  
Ranking Member  
House Committee on the  
Judiciary



Andy Kim  
United States Senator



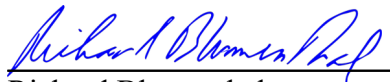
Shri Thanedar  
Member of Congress



Chris Van Hollen  
United States Senator



Dan Goldman  
Member of Congress



Richard Blumenthal  
United States Senator



Jeffrey A. Merkley  
United States Senator



Cory A. Booker  
United States Senator