

CONGRESSIONAL INTEGRITY PROJECT

September 9, 2024

The Honorable James Comer
Chairman, House Committee on Oversight and Reform
2157 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Comer:

With your year-and-a-half-long impeachment inquiry into President Biden officially over, you have made clear you are looking at new targets of potential Chinese influence peddling and corruption. In this vein, we want to draw your attention to troubling instances at the highest levels of the U.S. government which demand immediate congressional investigations and appropriate accountability.

Throughout your failed impeachment investigation into President Biden and his family, you have repeatedly expressed concern about influence peddling, particularly in regards to our adversaries. Last May, you stated plainly “the American people need to know” if our nation’s leaders “sold out the United States of America” for profit.¹ In media appearances, you shared your deeply held concerns about political leaders allegedly using their public office to “engage in influence peddling with our adversaries . . . most [concerningly], China.”² You further stated that government officials seeking to curry favor from foreign governments for personal gain would be especially problematic because it presents a clear “national security risk” to the United States.³

We are calling on you to direct the appropriate oversight committees of the House of Representatives to investigate the business Donald Trump and his family did in China while Trump held the office of president and Ivanka Trump and her husband, Jared Kushner, worked in the White House. Republican committee chairmen have not sent any letters, requested any information, issued subpoenas, or announced any hearings on potential investigations into the Trump family's influence peddling and corruption despite ample evidence showing that Trump and his family profited from Chinese businesses while he was in office and engaged in direct talks, negotiations, and trade deals with the CCP.

¹ House Committee on Oversight and Accountability Press Release (May 3, 2023), Grassley, Comer Demand FBI Record Alleging Criminal Scheme Involving Then-VP Biden, <https://oversight.house.gov/release/grassley-comer-demand-fbi-record-alleging-criminal-scheme-involving-then-vp-biden/>.

² ‘Sunday Morning Futures with Maria Bartiromo’, *Biden family was influence peddling with US adversaries: Rep. James Comer*, Fox News (Dec. 4, 2022), <https://www.foxnews.com/video/6316573410112>.

³ Ibid.

Donald Trump And His Family Have Extensive Financial Ties To The CCP

While President Trump was in office, he collected millions of dollars from government-owned entities in China.⁴ Trump properties leased by the Industrial Bank of China, contributed to at least \$5.4 million in business inflows during the Trump presidency. And the former president is clearly well aware of such multi-million dollar updates, bragging that he has “the best tenants in the world.”

Trump spent a decade unsuccessfully pursuing projects in China, operating an office there during his first run for president and forging a partnership with a major government-controlled company.⁵ And, China is one of only three foreign nations where Mr. Trump maintained a bank account during his presidency.

Trump’s business dealings with the Chinese government raise legal and ethical concerns. The U.S. Constitution prohibits federal officials from accepting “any present, emolument, office, or title, of any kind whatever, from any king, prince, or foreign state” without Congressional approval. Ethics experts, who have often focused on the president’s hotel in Washington, D.C., argued that the president violated the Constitution’s emoluments clause from the moment he took office.⁶

In 2018, Donald Trump Jr.’s business partner, Indonesian billionaire Hary Tanoesoedibjo, inked a deal with a Chinese state-owned construction company, the Metallurgical Corporation of China, to build a theme park next to planned Trump properties including a six-star hotel and golf course. Trump Jr. later flew to Indonesia to promote the Trump resorts with Tanoesoedibjo.⁷

In addition, Donald Trump’s son-in-law, Jared Kushner, also sought to enter into a business deal with Chinese investors with close ties to the Chinese government after Trump was elected in 2016.⁸ During his time in the White House, Kushner held secret meetings with foreign officials, including Chinese officials, which he failed to coordinate with or report to the National

⁴ Dan Alexander, *Forbes Estimates China Paid Trump At Least \$5.4 Million Since He Took Office, Via Mysterious Trump Tower Lease*, Forbes, (Jan. 29, 2021), <https://www.forbes.com/sites/danalexander/2020/10/23/forbes-estimates-china-paid-trump-at-least-54-million-since-he-took-office-via-mysterious-trump-tower-lease/>.

⁵ Mike McIntire, Russ Buettner and Susanne Craig, *Trump Records Shed New Light on Chinese Business Pursuits*, The New York Times, (Oct. 20, 2020), <https://www.nytimes.com/2020/10/20/us/trump-taxes-china.html>.

⁶ Alex Altman, *Experts Say Donald Trump’s Plan on Conflicts of Interest Falls Short*, Time, (Jan. 11, 2017), <https://time.com/4631643/donald-trump-conflicts-interest-ethics-watchdogs/>.

⁷ Fira Abdurachman, Richard C. Paddock and Eric Lipton, *Donald Trump Jr., in Indonesia, Defends Family’s Global Business*, The New York Times, (Aug. 13, 2019), <https://www.nytimes.com/2019/08/13/world/asia/donald-trump-jr-indonesia.html>.

⁸ Susanne Craig, Jo Becker and Jesse Drucker, *Jared Kushner, a Trump In-Law and Adviser, Chases a Chinese Deal*, The New York Times, (Jan. 7, 2017), <https://www.nytimes.com/2017/01/07/us/politics/jared-kushner-trump-business.html>.

Security Council.⁹ Simultaneously, his family “courted state-connected investors in China and the Middle East” to bail out his family’s business.¹⁰

The Trump Family Benefited From Trademarks Approved By The Chinese Government

The foreign business dealings of Trump’s children, who held government positions and benefited financially while working in the White House, raise additional serious legal and ethical concerns.

During Trump’s time in office, the Chinese government approved multiple “Trump” family names in trademarks amid negotiations for new trade deals. In the fall of 2018, Ivanka Trump won initial approval for 16 trademarks – applied for two years prior and only granted in the midst of Trump’s trade war with China.¹¹ The Chinese government also approved two “Trump” trademarks, registered at Trump Tower in Manhattan.¹²

Months earlier, China gave Ivanka Trump seven new trademarks across multiple businesses that she applied for after President Trump took office – all approved around the time President Trump committed to keeping a Chinese Telecommunications Company afloat, even though the company has a history of violating American limits on doing business with countries like Iran and North Korea.¹³

Over a year earlier, Ivanka Trump received three trademark approvals in China on the same day she and her father dined with Chinese President Xi Jinping at Mar-a-Lago in Florida. According to the LA Times, “China awarded her three preliminary trademark approvals for jewelry, handbags, and spa services.”¹⁴

⁹ Shane Harris et al., *Kushner’s overseas contacts raise concerns as foreign officials seek leverage*, The Washington Post (Jan. 27, 2018),

https://www.washingtonpost.com/world/national-security/kushners-overseas-contacts-raise-concerns-as-foreign-officials-look-for-leverage/2018/02/27/16bbc052-18c3-11e8-942d-16a950029788_story.html.

¹⁰ Eric Lipton et al., *Those Foreign Business Ties? The Trump Sons Have Plenty Too*, The New York Times (Jan. 20, 2021), <https://www.nytimes.com/2019/10/11/us/politics/donald-trump-jr-eric-trump-business.html>.

¹¹ Jay Willis, *How Don Jr., Ivanka, and Eric Trump Have Profited Off Their Dad’s Presidency*, GQ, (Oct. 14, 2019), <https://www.gq.com/story/trump-kids-profit-presidency>.

¹² Erika Kinetz, *China grants 18 trademarks in 2 months to Trump, daughter*, Associated Press, (Nov. 6, 2018), <https://apnews.com/article/0a3283036d2f4e699da4aa3c6dd01727>.

¹³ Sui-Lee Wee, *Ivanka Trump Wins China Trademarks, Then Her Father Vows to Save ZTE*, The New York Times, (May 28, 2018), <https://www.nytimes.com/2018/05/28/business/ivanka-trump-china-trademarks.html>.

¹⁴ Noah Bierman and Chris Megerian, *Trump’s children take in millions overseas as president slams Biden’s son*, Los Angeles Times, (Oct. 10, 2019), <https://www.latimes.com/politics/story/2019-10-10/trumps-adult-children-do-business-overseas-as-president-slams-biden>.

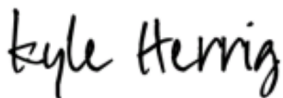
The Trump Family Operated a Web of Over 500 LLCs While In Office

Finally, during his presidency, the Trump family operated a web of over 500 LLCs, which were not subject to external audits or rigorous disclosure requirements.¹⁵ For decades, Donald Trump operated a web of shadowy LLCs used to evade taxes and conceal loans and business interests, possibly including with China. Even during his presidency, Trump's use of LLCs allowed him to keep much of his financial portfolio outside the public eye. As NBC News reported, "[W]e don't know which foreign assets or bank accounts he owns or where they're located.¹⁶ We don't know how much foreign tax he has paid and to which countries. We can't verify which charities he's funding."

In conclusion – if you are still interested in oversight and accountability as you have repeatedly claimed, looking into the Trump family influence peddling is an important next step. You and your committee finally have the free time to devote your considerable, taxpayer funded resources to follow up on promises to investigate possible influence peddling by Trump's son-in-law Jared Kushner and the former president's three eldest children, Ivanka, Don Jr., and Eric, while Donald Trump was in the White House.

While we acknowledge it will be difficult to conduct proper oversight of all the corrupt business deals with foreign adversaries carried out by former President Trump and his family during their time in office with your limited time and resources, we are hopeful this letter has brought to your attention a small portion of the many concerning arrangements worth investigating. As you have made clear, such unethical behavior from these high ranking officials directly threatens our national security. Should you desire more examples of the damning evidence implicating President Trump and his family in influence peddling with foreign adversaries, we stand ready to assist you.

Sincerely,



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¹⁵ Joel Eastwood, Coulter Jones and Julia Wolfe, *Trump, His Children, and 500+ Potential Conflicts of Interest*, The Wall Street Journal, (Jan. 19, 2017), <https://www.wsj.com/graphics/donald-trump-potential-conflicts-of-interest/>.

¹⁶ Ben Popken, *What Trump's disclosure of his 500 LLCs can and can't tell us*, NBC News, (May 16, 2018), <https://www.nbcnews.com/business/taxes/what-trump-s-disclosure-his-500-llcs-can-can-t-n874391>.