



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

February 3, 2026

The Honorable Arne B. Baker
Senior Official Performing the Duties of the Inspector General
U.S. Department of State
Office of Inspector General
1700 North Moore St (SA-39)
Arlington, VA 22209

Re: Request for Investigation into Potential Violations of the Foreign and Domestic Emoluments Clauses of the U.S. Constitution during the Process of Selecting and Hosting the 2026 G20 Summit at Trump National Doral

Dear Mr. Baker:

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests that the U.S. Department of State’s Office of the Inspector General (“State OIG”) perform an audit of the selection process that resulted in Trump National Doral property in Miami, Florida being named as host of the upcoming 2026 Group of 20 Nations (“G20”) Summit. We request that your office investigate whether the selection process and summit preparations thus far have involved any violations of the Foreign or Domestic Emoluments Clauses of the U.S. Constitution, as well as if the agency has sufficient internal controls in place to prevent any such violations that may arise during the Summit and its related events.

I. The 2026 G20 Summit was awarded to President Trump’s Doral National Club in Miami, Florida, which will bring significant revenue to the host city from visiting foreign dignitaries.

On September 5, 2025, President Trump announced that the 2026 G20 Summit will be hosted at his for-profit business, Trump National Doral, in Miami, Florida.¹ At a press conference, he told reporters that, “everybody wants it there, because it’s right next to the airport, it’s the best location,” and that “[t]hey actually requested that it be there because the

¹ *President Trump Makes Announcements, Sep. 5, 2025*, The White House (Sept. 5, 2025), <https://www.whitehouse.gov/videos/president-trump-makes-announcements-sep-5-2025/>.

location is the best and we will not make any money on it. You know, we're doing a deal where it's not going to be money."² Public reports in the months before the announcement indicated that the White House had been discussing plans to host the Summit at his for-profit business³ and a sign advertising "G20 Miami 2026" was seen at the Eisenhower Executive Office Building in June 2025.⁴

The agency solicited proposals from U.S. cities seeking to host the G20 Summit, submitted through the Office of the Chief of Protocol. According to that announcement, the United States will "host[...] a series of high-level meetings throughout the year to include multiple working groups and ministerials, culminating in a Leaders' Summit in November 2026."⁵ Potential host cities, beginning with their proposal during the selection process, work closely with the State Department throughout preparations and the Summit itself, with local and state government officials.⁶ Proposals also must identify the recommended venues and tourism officials, acknowledging the significance of the economic impact that will be enjoyed by the host venue and locality.⁷

President Trump has previously attempted to host a diplomatic summit at Trump National Doral without regard to proper solicitation or bidding processes. During his first term, President Trump announced that he was planning to host the 2020 G7 Summit at Trump Doral, which reportedly was a last-minute decision.⁸ In that instance, it had not been among the original four sites that had submitted proposals and had been vetted for the G7 Summit⁹ and was eventually abandoned after public outcry over the decision.¹⁰

² *Id.*

³ Josh Wingrove and Jorge Valero, *Trump Eyes His Doral Club for G-20 Summit*, Bloomberg (July 30, 2025), <https://www.bloomberg.com/news/articles/2025-07-30/trump-eyes-doral-club-for-g-20-summit-re-visiting-scrapped-idea>.

⁴ Alayna Treene, *Trump privately discussing plans to host G20 at his Doral resort, White House official says*, CNN (July 30, 2025), <https://www.cnn.com/2025/07/30/politics/g20-doral-resort-trump>.

⁵ Public Notice for the Department of State, 2026 United States' Host of the G20, 90 Fed. Reg. 1215 (Jan. 7, 2025) <https://www.govinfo.gov/content/pkg/FR-2025-01-07/pdf/2025-00018.pdf>.

⁶ *Id.*

⁷ *Id.*

⁸ David A. Fahrenthold and Josh Dawsey, *Trump's Doral Resort Was a Last-Minute Addition in Search for G-7 Site, Newly Released Email Shows*, Washington Post (Nov. 15, 2019), https://www.washingtonpost.com/politics/trumps-doral-resort-was-a-last-minute-addition-in-search-for-g-7-site-newly-released-email-shows/2019/11/15/f39056a0-07fa-11ea-8ac0-0810ed197c7e_story.html.

⁹ *Secret Service Records Contradict Trump's Claim on Doral G-7*, CREW (Nov. 15, 2019), <https://www.citizensforethics.org/reports-investigations/crew-investigations/secret-service-docs-contradict-trump-doral-g-7/>.

¹⁰ Anita Kumar and Evan Semones, *After backlash, Trump says his Doral resort won't host G-7 summit*, Politico (Oct. 19, 2019), <https://www.politico.com/news/2019/10/19/trump-says-his-doral-resort-will-no-longer-host-g7-summit-000292>.

Given President Trump's repeated use of the presidency to promote his business interests and the fact that he has attempted to improperly steer a similar diplomatic summit to Trump National Doral before, it is critical to the public trust that the selection process be reviewed to determine if it unduly favored the president's personal interest when selecting the host city. CREW has filed a FOIA request seeking additional information about the selection process.¹¹ We also urge your office, which is uniquely situated to audit the full process, to review whether the decision to host an international summit at one of President Trump's personal properties was influenced by President Trump's personal and family financial interests.¹²

Public concern about the integrity of the selection process and the potential for additional enrichment during the Summit events themselves is not merely a question of whether the president is being unjustly enriched. It is also a question of whether other cities were denied the economic benefits and opportunities—e.g., revenue, job creation, future investment—that host cities of past summits have enjoyed because that opportunity was awarded to the president's property. Data reported from past global leadership summits indicates the economic windfall that accompanies the decision to name a particular venue as host of a given summit: Last year, as a result of the G20 summit in Johannesburg, its tourism industry experienced significant investments.¹³ The influx of foreign leaders and their staffs “benefited sectors like hotels, retail, and hospitality, with a notable rise in five-star hotel occupancy” and “boost[ed] its global profile and future tourism prospects.”¹⁴ Predictions of anticipated revenue reflect the economic benefits that cities could expect; in 2024 as Rio de Janeiro prepared to host the G20 Summit, reports indicated that the tourism industry was expected to benefit significantly, with hotel occupancy rates reported to reach up to 95%, potentially resulting in staffing increases of up to 10%, and restaurants expecting up to 25% increases in revenue during the summit.¹⁵

The decision to select a particular host city and venue clearly serves as an economic boon for the businesses involved and their communities. Selection as host inevitably will mean significant financial gains for the host venue. A lost bid translates to loss of job creation opportunities, loss of new business and loss of international exposure for potential

¹¹ CREW Requests Records on Plans for G20 Summit at Trump Doral, CREW (Sept. 22, 2025), <https://www.citizensforethics.org/reports-investigations/foia-requests/crew-requests-records-on-plans-for-g20-summit-at-trump-doral/>.

¹² See 5 U.S.C. § 406. See also Ben Wilhelm, Cong. Rsch. Serv., R45450, Statutory Inspectors General in the Federal Government: A Primer (Nov. 13, 2023).

¹³ G20 Leaders' Summit Injected As Much As R3 Billion into Gauteng, Inside Politics (Nov. 25, 2025), <https://insidepolitic.co.za/g20-leaders-summit-injected-as-much-as-r3-billion-into-gauteng/>.

¹⁴ Dianna Games, South Africa's G20 Conference Bonanza, African Business (Nov. 26, 2025), <https://african.business/2025/11/trade-investment/south-africas-g20-conference-bonanza>.

¹⁵ Adele Cardin, G20 Summit Boosts Rio's Economy and Employment, The Rio Times (Oct. 18, 2024), <https://www.riotimesonline.com/g20-summit-boosts-rios-economy-and-employment/#:~:text=Revenue%20has%20grown%20by%2012.27%25%2C,as%20a%20key%20international%20destination>.

investment opportunities. Accordingly, an opportunity to host “the G20 Summit promises to boost the city’s economy and reinforce its status as a key international destination.”¹⁶ The impacts of the selection decision are not limited only to the duration of the summit itself but also include lost opportunities that such international exposure would mean for future tourism and investment.

Just as other Trump properties received financial windfalls during his presidency,¹⁷ Trump National Doral will receive economic windfalls as a result of its selection as the host of this Summit. Foreign officials and accompanying visitors can be expected to patronize the president’s luxury resort as a direct result of the administration’s decision to use the property. City officials responsible for planning events will likely direct business to the resort, even if just as a matter of convenience, which will further enrich the president as a consequence of this self-selection. These impacts—both to enrich the president while denying other Americans the same opportunities—is why it is so important that the process of selecting a Trump property for an international summit was conducted fairly.

II. Profits, gains and advantages from the G20 summit are subject to the Constitution’s Foreign and Domestic Emoluments Clauses, which prohibit the president from receiving any such benefits from foreign governments or foreign officials, or from the U.S. government, any of the states or their instrumentalities.

The Constitution’s Emoluments Clauses preclude the president from receiving any profit, gain or advantage from foreign governments, or from U.S. federal, state or local governments (other than salary) to ensure that the president remains impartial and uninfluenced by the power of other government officials.

The Foreign Emoluments Clause clearly states that “no Person holding any Office of Profit or Trust under [the United States], shall, without the Consent of the Congress, accept of any present, Emolument, Office, or Title, of any kind whatever, from any King, Prince, or foreign State.”¹⁸ Past presidents, when receiving any type of gift, award or benefit from a foreign government, voluntarily sought congressional approval.¹⁹ Congress has in turn

¹⁶ Adele Cardin, *G20 Summit Boosts Rio’s Economy and Employment*, The Rio Times (Oct. 18, 2024), <https://www.riotimesonline.com/g20-summit-boosts-rios-economy-and-employment/#:~:text=Revenue%20has%20grown%20by%2012.27%25%2C,as%20a%20key%20international%20destination>.

¹⁷ See Jordan Libowitz and Caitlin Moniz, *Trump Reported Making More Than \$1.6 Billion While President*, CREW (Feb. 22, 2021), <https://www.citizensforethics.org/reports-investigations/crew-investigations/trump-reported-making-more-than-1-6-billion-while-president/>; Honora Overby and Lama Elsharif, *Political Spending Tops \$900K at Trump Properties Since Inauguration*, CREW (Aug. 27, 2025), <https://www.citizensforethics.org/reports-investigations/crew-reports/political-spending-tops-900k-at-trump-properties-since-inauguration/>.

¹⁸ U.S. Const. Art. I, § 9, cl. 8.

¹⁹ Art. I, § 9, cl. 8 *Historical Background on Foreign Emoluments Clause*, Constitution Annotated, https://constitution.congress.gov/browse/essay/artI-S9-C8-2/ALDE_00013205/.

provided its consent for foreign gifts of minimal value, meant to avoid diplomatic embarrassment in the context of norms practiced by government officials exchanging token gifts.²⁰ The legislation enacted to provide consent in those limited contexts does not extend to the profits received from commercial transactions when government officials engage with a president's private business.²¹ It certainly is not broad enough to encompass financial windfalls received when the president has, at his own behest, used that business as a destination for those officials to conduct foreign policy.

The Domestic Emoluments Clause serves as a complement to the Foreign Emoluments Clause, ensuring that no domestic government—the states or their instrumentalities—can garner the president's favor. It expressly states that the president, aside from compensation set at the beginning of his term, “shall not receive within that Period [for which he shall have been elected] any other Emolument from the United States, or any of them.”²² The clause seeks to ensure that the president serves the American public as a whole.²³ The prohibition of domestic emoluments is absolute and cannot be allowed even by consent of Congress.²⁴

These constitutional protections are critically important in the process of preserving executive independence from outside interference. Many other federal ethics statutes have not been applied to the president for separation of powers reasons. But the Constitution's Emoluments Clauses ensure that the president is not unduly influenced by financial gains received from other governments with interests that are inherently distinct from those of the American public as a whole.

III. Potential Violations

Any profit, gain or advantage received by President Trump—whether from a foreign government, foreign official, state or local government, or their officials—as a result of the summit being held at Trump Doral would violate the Constitution's Foreign or Domestic Emoluments Clauses respectively. The clauses are drafted broadly to ensure that the president would not be improperly influenced when another government or its officials provided him with a personal financial gain.

Although any direct payment or other financial benefit would certainly qualify as an emolument, a range of other opportunities to enrich the president or his business interest

²⁰ *Id.*

²¹ *See id.*; 5 U.S.C. § 7342.

²² U.S. Const. Art. II, § 1, cl. 7.

²³ The Federalist No. 73 (Alexander Hamilton) (explaining that the president “can, of course, have no pecuniary inducement to renounce or desert the independence intended for him by the Constitution”).

²⁴ Art. II, § 1, cl. 7 *Emoluments Clause and Presidential Compensation*, Constitution Annotated, https://constitution.congress.gov/browse/essay/artII-S1-C7-1/ALDE_00000233/.

in Trump Doral exist. That list includes, but is not limited to, any payments to the property by city officials for reservation or related fees to use event space as well as any payments to book lodging at the resort by foreign officials. Even if the event is hosted by Trump Doral “at cost,” emoluments would include revenue from those foreign officials or the city in any form, including basic commercial transactions in the gift shop or fees to use the golf course, to name just a few examples.

IV. Areas for Investigation

Based on information in various news reports cited above, CREW requests that the State OIG use its authority to investigate whether the selection process of Miami and specifically Trump Doral followed proper protocol before the administration handpicked a host site in which the president has a personal financial interest. A complete audit of that process should be conducted and provided to the public for transparency and accountability that the legal process used for selection was followed. CREW also requests that the State OIG use its authority to investigate potential violations of the Foreign and Domestic Emoluments Clauses that have or may result from Trump Doral hosting an international leadership summit, as well as whether sufficient internal controls are in place to prevent any continuing or future violations.

Areas for investigation include:

1. The process by which any State Department officials selected Miami, Florida as the host city for the 2026 G20 Summit.
2. Whether that process followed the legal requirements for selection of a host city.
3. Whether the State Department had proper safeguards in place during the selection process to ensure that cities that submitted bids were fairly considered, regardless of whether they offered a venue connected to the president personally.
4. Whether Trump Doral has already received any payments or other emoluments from a foreign government, the State of Florida, Miami-Dade County, the City of Miami, the City of Doral or their respective officials.
5. Identification of safeguards that are in place with respect to preventing any such payments or other emoluments going forward, and whether those safeguards constitute sufficient internal controls by State OIG standards.

V. Conclusion

President Trump has previously attempted to host an international leadership summit at Trump Doral and withdrew that decision after public outcry. The latest announcement to attempt to host a larger summit reflects an even bigger risk of corruption

and must be investigated to ensure adherence to the law. The unjust enrichment of the president's personal financial interests, including future earning potential even if the event is hosted at cost, is a violation of the constitutional emoluments clauses. But just as importantly, the lost earning potential and economic benefits of other American localities that lost their bids to boost their own economies and residents' incomes must not be permitted simply because of the president's misused opportunity for personal financial gain.

CREW greatly appreciates your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sherman', with a long horizontal flourish extending to the right.

Donald Sherman
President and Chief Executive Officer

Cc: The Honorable James E. Risch
Chairman, Senate Committee on Foreign Relations
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The Honorable Jeanne Shaheen
Ranking Member, Senate Committee on Foreign Relations
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