



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

March 23, 2026

Joseph Cuffari
Office of Inspector General/Mail Stop 0305
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528-0305

Dear Inspector General Cuffari,

Citizens for Responsibility and Ethics in Washington (“CREW”) respectfully requests that the Department of Homeland Security (“DHS”) Office of Inspector General (“OIG”) investigate allegations of misuse of position and violations of other applicable standards of conduct related to enforcement at Immigration and Customs Enforcement (“ICE”).

According to recent public reports, a longtime political ally of President Trump solicited and received assistance from ICE personnel to take action to detain the mother of his child amidst a custody dispute.¹ Regardless of whether the underlying immigration detainment may have been legally warranted, these allegations, if true, constitute numerous violations of executive branch and ICE rules regarding the performance of their professional duties.² Given the recent pattern of misconduct by DHS and ICE personnel, these allegations demand immediate investigation by DHS OIG to ensure the public that immigration enforcement is being conducted impartially, without undue political influence and consistent with the law. A thorough review is especially critical given the leadership transition at DHS as a result of egregious prior ethical and management lapses.³

¹ Megan Twohey, Shawn McCreech & Hamed Aleaziz, *Trump Friend Asked ICE to Detain the Mother of His Child*, N.Y. Times (Mar. 20, 2026), <https://www.nytimes.com/2026/03/20/us/paolo-zampolli-ice-melania-trump-epstein.html>.

² See e.g., 5 C.F.R. § 2635.101 (b)(6) & (b)(8).

³ Jonathan Allen, *How Kristi Noem's fate was sealed: From the Politics Desk*, NBC News (Mar. 5, 2026), <https://www.nbcnews.com/politics/politics-news/kristi-noem-fate-was-sealed-politics-desk-rcna262016>.

Factual background

Last week, *the New York Times* reported that Paolo Zampolli, President Trump's special envoy for global partnerships, engaged ICE personnel after learning that his Brazilian ex-girlfriend was in a Miami jail on fraud charges. Mr. Zampolli, at the time embroiled in a custody battle over his teenage son, reportedly contacted a senior ICE official "explaining that his ex was in the country illegally" and asking if she could be put in ICE detention, which could help him gain custody of their son.⁴ The ICE official, David Venturella, the "No. 2 official overseeing the ICE division that manages contracts for immigrant detention centers,"⁵ apparently promptly called agency personnel in Miami "to ensure that ICE agents would pick up the woman from the jail before she was released on bail."⁶ During the call with ICE personnel, Mr. Venturella allegedly explained that the case "was important to someone close to the White House."⁷ Mr. Zampolli denied to the *Times* asking ICE to detain his ex-girlfriend or for any other favors, and asserted he "merely asked Mr. Venturella to explain what was going on with her case."⁸

Zampolli has numerous ties to the president and his allies. Zampolli has recently been pictured with President Trump's Chief of Staff Susie Wiles at the White House as well as the president's son-in-law and fellow special envoy, Jared Kushner.⁹ According to reporting by the *Times*, Zampolli also has longstanding ties to Trump associate Jeffrey Epstein.¹⁰

In recent months, ICE has faced intense scrutiny about training and law enforcement practices following the shooting deaths of two American citizens by DHS personnel in the course of aggressive immigration operations in Minnesota and reports that the Trump administration is struggling to defend ICE enforcement actions in court.¹¹ Reports of ICE bending to political influence to weaponize detention is yet another example of an agency run amok. During Secretary Kristi Noem's tenure, the Department has been ensnarled in

⁴ Twohey, McCreesh & Aleaziz, *supra* note 1.

⁵ Douglas MacMillan & Aaron Schaffer, *The former private prison exec behind ICE's immigrant detention surge*, Wash. Post (Aug. 1, 2025), <https://www.washingtonpost.com/business/2025/08/01/ice-david-venturella-geo-immigration-detention/>.

⁶ Twohey, McCreesh & Aleaziz, *supra* note 1.

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ Tiffany Wertheimer, *Who was Renee Nicole Good, the woman killed by ICE?*, BBC (Jan. 13, 2026), <https://www.bbc.com/news/articles/c1jepdjy256o>; Kurt Streeeter, *How Alex Pretti's Death Became a National Tipping Point*, N.Y. Times (Feb. 1, 2026), <https://www.nytimes.com/2026/02/01/us/alex-pretti-minneapolis.html>; Kyle Cheney, *Trump administration waves the white flag in some ICE cases*, Politico (Mar. 20, 2026), <https://www.politico.com/news/2026/03/20/ice-detention-cases-doj-judges-00837850>.

countless corruption scandals including a \$220 million dollar advertising contract handed to one of Noem's allies,¹² which helped lead to her unceremonious ouster.¹³

Potential legal violations

The allegations regarding ICE personnel's response to Mr. Zampolli's request to detain the mother of his child implicates potential violations of several rules that govern the conduct of ICE employees. For example, the Standards of Ethical Conduct for Executive Branch Employees, codified at 5 C.F.R. § 2635.101, outline the "basic obligation of public service."¹⁴ One such obligation is that "[e]mployees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Government."¹⁵ ICE personnel's prompt response to Mr. Zampolli's reported request for intervention in his ex-girlfriend's case and communication that it came from someone "close to the White House" suggest that ICE employees may have inappropriately bound the government to take action in the matter without authorization.

The Standards of Ethical Conduct also require that "[e]mployees shall act impartially and not give preferential treatment to any private organization or individual"¹⁶ and that employees may not use their public office for private gain, whether it be their own or someone with whom they are affiliated.¹⁷ Put together, these rules prohibit government officials from seeking personal favors and acting outside standard procedures or channels to seek agency action in any matter, while also barring officials from participating in agency decisions that would affect their personal interests. The allegations regarding ICE official David Venturella's expeditious response to a personal request for enforcement action from the president's political ally suggest both that ICE provided Mr. Zampolli with preferential treatment because of his political ties and that, regardless of the underlying merits, enforcement action was not pursued in an impartial manner.

The allegations regarding ICE personnel's response to the Zampolli request may also violate ICE policies outlined in its Guidance to Offenses and Penalties.¹⁸ For example, such policies prohibit the following conduct by ICE managers, supervisors, and employees:

¹² Dharna Noor, *Why US disaster response workers won't miss the 'singularly destructive force' that was Kristi Noem*, The Guardian (Mar. 13, 2026), <https://www.theguardian.com/environment/2026/mar/12/a-singularly-destructive-force-us-disaster-response-workers-on-the-legacy-of-kristi-noem>; Justin Elliot, Joshua Caplan & Alex Mierjeski, *Firm Tied to Kristi Noem Secretly Got Money From \$220 Million DHS Ad Contracts*, ProPublica (Nov. 14, 2025), <https://www.propublica.org/article/kristi-noem-dhs-ad-campaign-strategy-group>.

¹³ Allen, *supra* note 3.

¹⁴ 5 C.F.R. § 2635.101.

¹⁵ 5 C.F.R. § 2635.101 (b)(6).

¹⁶ 5 C.F.R. § 2635.101 (b)(8); 5 C.F.R. § 2635.502.

¹⁷ 5 C.F.R. § 702.

¹⁸ DHS, ICE Guidance to Offenses and Penalties (last visited Mar. 21, 2026) https://www.ice.gov/doclib/foia/policy/10221_TableOfOffensesPenalties_Guidance.pdf.

- “Giving the appearance of a conflict of interest; violating law; or violating the ethical standards of conduct”
- “Failure to observe established policies or procedures in the apprehension or detention of suspects, violators, or illegal aliens.”
- “Ethics violation (5 CFR 2635) not elsewhere covered in this Table”¹⁹

Taking enforcement action based on the request of someone outside the ICE chain of command, as a favor for a political ally of the president, could certainly implicate each of these rules, and merits thorough investigation to determine if these or any other ICE legal standards or regulations were violated. To the extent that DHS OIG believes that any non-DHS government official, including Mr. Zampolli, has violated applicable ethics rules, their conduct should be referred to the appropriate oversight body at the White House, State Department or any other applicable agency.

Conclusion

The Department of Homeland Security and ICE have a critical mission to perform on behalf of the American people. Public trust in this agency has been undermined by the reckless actions by ICE agents that resulted in the deaths of American citizens, and new allegations of enforcement decisions being made as a result of personal favors requested by the president’s associate. To ensure integrity and accountability at ICE, a prompt investigation by DHS OIG of the allegations involving ICE personnel’s response to Mr. Zampolli’s request is necessary. Especially as President Trump embarks on a haphazard plan to use ICE agents at airports,²⁰ it is imperative that your office conduct a thorough review to determine if any legal and ethical standards were violated, if similar instances may have occurred at ICE and how the agency can avoid any such abuses in the future.

Sincerely,



Donald K. Sherman
President and Chief Executive Officer

cc: State Department Office of Inspector General

¹⁹ *Id.* at 14, 17, and 19.

²⁰ Kathryn Palmer, *Trump to send ICE agents to help strained TSA at airports*, USA Today (Mar. 22, 2026), <https://www.usatoday.com/story/news/politics/2026/03/22/trump-ice-tsa-airports-shutdown-immigration/89274375007/>.