

July 12, 2017

Special Counsel Robert Mueller
United States Department of Justice
950 Constitution Avenue, N.W.
Washington, D.C. 20530

Dear Special Counsel Mueller:

Citizens for Responsibility and Ethics in Washington (“CREW”) writes to respectfully bring to your attention information and potential lines of inquiry related to a crucial subject in your ongoing investigation: whether there are financial ties between President Donald J. Trump and Russia. In light of this week’s revelation that on June 9, 2016 Donald J. Trump Jr., Paul Manafort, and Jared Kushner met with a lawyer presented as “a Russian government attorney” who they were told would deliver “official documents and information that would incriminate Hillary [Clinton] and her dealings with Russia . . . ,”¹ it is more important than ever to assess all ways in which President Trump and those around him might be subject to influence by Russia, including through financial connections and transactions. As set out below, there is considerable evidence suggesting the possibility of significant financial ties between President Trump and his associates and Russia. Investigating the existence and extent of current or past financial ties may help to shed light on the motives for possible collusion in connection with Russian interference in the 2016 presidential election; why the President and his associates have repeatedly failed to disclose meetings with Russian officials; and why the President may have sought to obstruct justice by impeding the FBI’s investigation of these and other matters.

As you no doubt have considered, an inquiry into the President’s financial ties to Russia is squarely within the scope of your authority as special counsel, as laid out in Deputy Attorney General Rod Rosenstein’s Order No. 3915-2017.² That document authorizes you to “conduct the investigation confirmed by then-FBI Director James B. Comey . . . including: (i) any links and/or coordination between the Russian government and individuals associated with the campaign of President Donald Trump; and (ii) any matters that arose or may arise directly from the investigation; and (iii) any other matters within the scope of 28 C.F.R. § 600.4(a).”³ Section 600.4(a) grants you, the special counsel, the additional authority to “investigate and prosecute crimes committed in the course of, and with intent to interfere with, the Special Counsel’s investigation, such as perjury, obstruction of justice, destruction of evidence, and intimidation of witnesses.” Fully investigating financial ties between

¹ See <https://twitter.com/DonaldJTrumpJr/status/884789839522140166>; Jo Becker, Adam Goldman, and Matt Apuzzo, *Russian Dirt on Clinton? ‘I Love It,’ Donald Trump Jr. Said*, *New York Times*, July 11, 2017, available at <https://www.nytimes.com/2017/07/11/us/politics/trump-russia-email-clinton.html>.

² Office of the Deputy Attorney General, *Order No. 3915: Appointment of Special Counsel to Investigate Russian Interference with the 2016 Presidential Election and Related Matters*, May 17, 2017, available at <https://assets.documentcloud.org/documents/3726381/Robert-Mueller-Special-Counsel-Russia.pdf>.

³ *Id.*

President Trump (and his associates) and Russia is necessary to determine the extent of the “links and/or coordination” between these elements. Investigation of these ties may also inform any potential case against President Trump for firing then-FBI Director James Comey because he refused to discontinue the investigation into Russian interference and the related investigation into former National Security Advisor Michael Flynn.

A wealth of publicly available evidence suggests that President Trump and his businesses have had a variety of financial dealings with Russian entities. Several accounts suggest that President Trump and his businesses received significant financial support from Russian entities after the great recession. In 2008, for example, Donald J. Trump Jr. said that Russians “make up a pretty disproportionate cross-section of a lot of our assets” and that “[w]e see a lot of money pouring in from Russia.”⁴ President Trump made millions by hosting the 2013 Miss Universe pageant in Moscow.⁵ Journalist James Dodson asserted that in 2013, Eric Trump told him that all of the funding for Trump golf courses since the recession had come from Russia,⁶ though Eric Trump has denied this account of the conversation.⁷ According to Mr. Dodson, Eric Trump said that the family didn’t “rely on American banks.” Instead, they “have all the funding we need out of Russia” – as much as \$100 million.⁸ Indeed, in April 2017, Sir Richard Dearlove, the former head of British intelligence service MI-6, stated that “[w]hat lingers for Trump may be what deals – on what terms – he did after the financial crisis of 2008 to borrow Russian money when others in the west apparently would not lend to him.”⁹ In addition, the *New York Times* recently reported that Russia renewed six trademarks owned by President Trump that were set to expire.¹⁰

It is even possible that President Trump’s business dealings in Russia have already exposed him to foreign influence. CNN has reported that U.S. intelligence agencies intercepted communications of Russian government officials discussing potentially

⁴ Hazel Heyer, *Executive Talk: Donald Trump Jr. Bullish on Russian and Few Emerging Markets*, *eTN*, Sept. 15, 2008, available at <http://www.eturbonews.com/5008/executive-talk-donald-trump-jr-bullish-russia-and-few-emerging-ma>.

⁵ Nelli Black and Curt Devine, *These Are Trump’s Ties to Russia*, *CNN*, Jan. 12, 2017, available at <http://www.cnn.com/2017/01/11/politics/trump-ties-with-russia/>.

⁶ Caitlin Yilek, *Author Claims Eric Trump Told Him All Funding for Trump Golf Courses Comes from Russia in 2014*, *Washington Examiner*, May 7, 2017, available at <http://www.washingtonexaminer.com/author-claims-eric-trump-told-him-all-funding-for-trump-golf-courses-comes-from-russia-in-2014/article/2622364>.

⁷ Benjamin Swasey and Martin Kessler, *Eric Trump Denies Telling a Sportswriter the Trumps Got Golf Course Funding from Russia*, *WBUR*, May 8, 2017, available at <http://www.wbur.org/onlyagame/2017/05/08/eric-trump-russia-golf-course-funding>.

⁸ Yilek, *Washington Examiner*, May 7, 2017; Bill Littlefield, *A Day (and a Cheeseburger) with President Trump*, *WBUR*, May 5, 2017, available at <http://www.wbur.org/onlyagame/2017/05/05/james-dodson-donald-trump-golf>.

⁹ Jay Elwes, *Interview: Richard Dearlove – I Spy Nationalism*, *Prospect*, Apr. 13, 2017, available at <https://www.prospectmagazine.co.uk/magazine/interview-richard-dearlove-europe-intelligence-mi6>.

¹⁰ Mike McIntire, *Russia Renewed Unused Trump Trademarks in 2016*, *New York Times*, June 18, 2017, available at https://nytimes.com/2017/06/18/us/politics/russia-trump-trademarks.html?_r=0&referrer=https://t.co/m6FaV8Y32s.

“derogatory” information about then-candidate Trump and some of his top aides.¹¹ According to one of CNN’s sources, an official indicated that the information was “financial in nature” and that the “discussion centered on whether the Russians had leverage over Trump’s inner circle.”¹² CNN’s source also said that the intercepted communications suggested that the Russians believed that they could use the derogatory information to influence the Trump administration.¹³

Other financial entanglements may implicate senior members of President Trump’s staff. Just before election day, Mr. Kushner, who attended the June 9, 2016 meeting with Donald J. Trump Jr., received a \$285 million loan from Deutsche Bank, an institution that has settled charges that it aided a possible Russian money laundering scheme.¹⁴

Many important questions that could clarify the extent of any ties between President Trump and Russia continue to go unanswered:

- Unlike other Presidents over the last 40 years, President Trump has refused to release his tax returns.¹⁵ Instead, his lawyers have released a letter stating that President Trump’s taxes over the last decade did not reveal income or debt from Russian entities “with a few exceptions,” namely: (1) \$12.2 million of income from the 2013 Miss Universe pageant; (2) \$95 million from a Russian billionaire for the 2008 sale of a property in Florida; and (3) other sales of goods and services that might be attributable to Russian sources.¹⁶ These assertions could be truthful, but there is no way of verifying them without the President’s actual tax returns.
- Members of Congress have asked about Russian connections, if any, to Deutsche Bank’s loans to, and other dealings with, President Trump.¹⁷ Thus far, they have received no response.
- In addition, three pending lawsuits against President Trump may reveal that he is receiving emoluments from the Russian government in violation of the Foreign

¹¹ Zachary Cohen, The Russia Investigation: Everything You Need to Know, *CNN*, June 7, 2017, available at <http://www.cnn.com/2017/05/26/politics/russia-investigation-what-to-know/index.html>.

¹² *Id.*

¹³ *Id.*

¹⁴ Michael Kranish, Kushner’s Firm’s \$285 Million Deutsche Bank Loan Came Just Before Election Day, *Washington Post*, June 25, 2017, available at https://www.washingtonpost.com/national/kushner-firms-285-million-deutsche-bank-loan-came-just-before-election-day/2017/06/25/984f3acc-4f88-11e7-b064-828ba60fbb98_story.html?utm_term=.e9f8bdc51bc6.

¹⁵ Norman Eisen and Richard Painter, What Trump’s Tax Returns Could Tell Us about His Dealings with Russia, *Politico*, Oct. 31, 2016, available at <http://www.politico.com/magazine/story/2016/10/donald-trump-taxes-russia-214405>.

¹⁶ Sheri Dillon and William Nelson, Morgan Lewis, Letter to President Donald J. Trump Re: Transactions with Russian Counterparties Reported on Your U.S. Federal Income Tax Returns, Mar. 8, 2017, available at <http://www.wsj.com/public/resources/documents/TrumpTaxRussiaLetter2017.pdf>.

¹⁷ Hon. Maxine Waters, *et al.*, Letter to John Cyran Re: Internal Reviews Conducted by Deutsche Bank, May 23, 2017, available at https://democrats-financialservices.house.gov/uploadedfiles/ltr_fsc_to_john_cryan_deutsche_bank_mirror_trade_and_trump_accounts_5.23.17.pdf.

Emoluments Clause. Should you corroborate Russian government financial ties to Mr. Trump, they would likely be constitutional violations as well.¹⁸

At the very least, your investigation should scrutinize President Trump's tax returns as well as his business records and the records of his associates to determine whether they yield any information of interest to the matters you are investigating.

Indeed, the revelations of the last few days point to a link between President Trump's business ties to Russia and the emerging story of the Trump campaign's apparent receptivity to Russian interference in the election. The emails indicate two separate potential channels for communications between Russia and senior Trump campaign officials, reflecting Trump Organization business ties and possibly including President Trump himself. Rob Goldstone, an international marketing director for PR company Oui2, set up the meeting between Russian lawyer Natalia Veselnitskaya and Donald Trump Jr., Mr. Manafort, and Mr. Kushner.¹⁹ Mr. Goldstone said that he did so on behalf of Russian singer Emin Agalarov, a client of his and the son of Aras Agalarov, an Azerbaijan-born billionaire who runs the Crocus Group, a large real estate development company in Russia.²⁰ The Crocus Group owns the concert hall where President Trump hosted the 2013 Miss Universe Pageant and paid him at least \$14 million to host the pageant.²¹ In a 2015 interview on "The Hugh Hewitt Show," President Trump bragged about the pageant: "I was with the top-level people, both oligarchs and generals, and top-of-the-government people. I can't go further than that, but I will tell you that I met the top people, and the relationship was extraordinary."²² Shortly after the pageant, Russian President Vladimir Putin awarded Aras Agalarov the Order of Honor, one of the country's highest civilian awards.²³ Additionally, the emails themselves make reference to an alternate,

¹⁸ Press Release, CREW, CREW Sues Trump Over Emoluments, Jan. 22, 2017, available at <https://www.citizensforethics.org/press-release/17451/>; Aaron C. Davis, D.C. and Maryland Sue President Trump, Alleging Breach of Constitutional Oath, *Washington Post*, June 12, 2017, available at https://www.washingtonpost.com/local/dc-politics/dc-and-maryland-to-sue-president-trump-alleging-breach-of-constitutional-oath/2017/06/11/0059e1f0-4f19-11e7-91eb-9611861a988f_story.html?utm_term=.80104dde6dbc; Sharon LaFraniere, Democrats in Congress Sue Trump Over Foreign Business Dealings, *New York Times*, June 14, 2017, available at <https://www.nytimes.com/2017/06/14/us/politics/democrats-in-congress-to-sue-trump-over-foreign-business-dealings.html>. CREW is co-counsel in the first two of those actions.

¹⁹ Daniella Diza, Who Is Rob Goldstone? The Man Behind Trump Jr.'s Meeting with Russian Lawyer, *CNN*, July 11, 2017, available at <http://www.cnn.com/2017/07/11/politics/who-is-rob-goldstone-donald-trump-jr/index.html?sr=twCNN071117who-is-rob-goldstone-donald-trump-jr0602PMVODtop>.

²⁰ Megan Twohey and Steve Eder, How a Pageant Led to a Trump Son's Meeting with a Russian Lawyer, *New York Times*, July 10, 2017, available at <https://www.nytimes.com/2017/07/10/us/politics/rob-goldstone-russia-trump.html>.

²¹ *Id.*

²² *Id.*

²³ *Id.*

presumably existing channel of communication, namely passing information to then-candidate Trump “via Rhona.”²⁴

President Trump has asserted that he does not have continuing business ties to Russia.²⁵ However, this week’s revelations continue the pattern of obfuscation and deceit that has long characterized how senior members of the Trump campaign and administration have approached this matter, mandating thorough investigation rather than reliance on such denials. Three weeks before the 2016 presidential election, Donald J. Trump Jr. attended a private dinner in Paris organized by a “pro-Russia group that promotes Kremlin foreign policy initiatives.”²⁶ One of the dinner’s hosts, Randa Kassis, travelled to Moscow shortly after the election and discussed the dinner with the deputy head of Russia’s Foreign Ministry.²⁷ Mr. Flynn, a Trump campaign surrogate who served as national security advisor until February 14,²⁸ resigned after it was revealed that he may have had illegal contacts with Russian officials during the transition and then failed to disclose these contacts. Mr. Kushner, who now serves as a senior adviser to the President, failed to disclose several meetings with Russian officials on his application for a security clearance.²⁹ During his confirmation hearings before the Senate Judiciary Committee, Attorney General Jeff Sessions failed to disclose at least two meetings that he had with Russian officials while serving as a Trump campaign surrogate.³⁰ Only after those contacts were reported did the Attorney General

²⁴ See <https://twitter.com/DonaldJTrumpJr/status/884789839522140166>. “Rhona” apparently refers to President Trump’s longtime assistant, Rhona McGraff. Tara Palmieri, *Need to Reach Trump? Call Rhona*, *Politico*, Mar. 26, 2017, available at <http://www.politico.com/story/2017/03/rhona-graff-trump-conduit-236484>.

²⁵ See, e.g., <https://twitter.com/realdonaldtrump/status/819159806489591809> (“I HAVE NOTHING TO DO WITH RUSSIA - NO DEALS, NO LOANS, NO NOTHING!”).

²⁶ Brian Ross, Matthew Mosk, and Rym Momtaz, *For Donald Trump Jr., lingering questions about meeting with pro-Russia group*, *ABC News*, Mar. 2, 2017, available at <http://abcnews.go.com/Politics/trump-jr-lingering-questions-meeting-pro-russia-group/story?id=45858839>.

²⁷ *Id.*

²⁸ Greg Miller and Phillip Rucker, *Michael Flynn Resigns as National Security Adviser*, *Washington Post*, Feb. 14, 2017, available at https://www.washingtonpost.com/world/national-security/michael-flynn-resigns-as-national-security-adviser/2017/02/13/0007c0a8-f26e-11e6-8d72-263470bf0401_story.html?utm_term=.2520f2a74955.

²⁹ Jo Becker and Matthew Rosenberg, *Kushner Omitted Meeting with Russians on Security Clearance Forms*, *New York Times*, Apr. 6, 2017, available at https://www.nytimes.com/2017/04/06/us/politics/jared-kushner-russians-security-clearance.html?_r=0

³⁰ Adam Entous, Ellen Nakashima, and Greg Miller, *Sessions Met with Russian Envoy Twice Last Year, Encounters He Later Did Not Disclose*, *Washington Post*, Mar. 1, 2017, available at https://www.washingtonpost.com/world/national-security/sessions-spoke-twice-with-russian-ambassador-during-trumps-presidential-campaign-justice-officials-say/2017/03/01/77205eda-feac-11e6-99b4-9e613afeb09f_story.html?utm_term=.903fe0d9e7d7.

recuse himself from the investigation that you now lead.³¹ Attorney General Sessions also failed to disclose meetings with Russian officials on his application for a security clearance.³²

Throughout the campaign and even after President Trump was inaugurated, senior members of his campaign and his administration vehemently denied any connections between the campaign and Russia. During a July 24, 2016 interview on ABC's *This Week*, campaign chairman Paul Manafort denied any connection between the Trump campaign and Russia or President Putin by calling it "absurd" and stating that "there's no basis to it."³³ On October 24, then-candidate Trump told a rally in Florida that he had "nothing to do with Russia, folks. I'll give you a written statement."³⁴ On January 15, 2017, in response to a question from ABC's John Dickerson about whether anybody in the Trump campaign had contact with the Russians who were trying to meddle in the elections, Vice President-elect Mike Pence said, "Well of course not. I think to suggest that is to give credence to some of these bizarre rumors that have swirled around the candidacy."³⁵ And the *New York Times* has reported that in an interview in March 2017, Donald J. Trump Jr. said, "Did I meet with people that were Russian? I'm sure, I'm sure I did."³⁶ He continued, "But none that were set up. None that I can think of at the moment. And certainly none that I was representing the campaign in any way, shape or form."³⁷ Recent revelations cast serious doubt on many, if not all, of these denials.

One of the fundamental unanswered questions that persists is why the Trump campaign took meetings with Russian officials and why members of the campaign and administration denied with such frequency that they happened. Outright collusion between the Russian government and the Trump campaign is one theory that demands investigation; however, we respectfully request that you also investigate financial ties between President Trump and Russia, which could illuminate both motive and methods for these contacts.

³¹ Karoun Demirjian, Ed O'Keefe, Sari Horwitz, and Matt Zapotosky, *Attorney General Jeff Sessions Will Recuse Himself from Any Probe Related to 2016 Presidential Campaign*, *Washington Post*, Mar. 2, 2017, available at https://www.washingtonpost.com/powerpost/top-gop-lawmaker-calls-on-sessions-to-recuse-himself-from-russia-investigation/2017/03/02/148c07ac-ff46-11e6-8ebe-6e0dbe4f2bca_story.html?utm_term=.60051ea8b0e.

³² Rebecca Ruiz, *Sessions Was Advised Not to Disclose Russia Meetings on Security Forms*, *New York Times*, May 24, 2017, available at <https://www.nytimes.com/2017/05/24/us/politics/jeff-sessions-russia.html>.

³³ 'This Week' Transcript: Live from Philadelphia Democratic National Convention, *ABC News*, July 24, 2016, available at <http://abcnews.go.com/ThisWeek/week-transcript-live-philadelphia-democratic-national-convention/story?id=40825144>.

³⁴ Trump: 'I Have Nothing to Do with Russia, Folks', *NBC News*, Oct. 24, 2016, available at <http://www.nbcnews.com/video/trump-i-have-nothing-to-do-with-russia-folks-792709187907>.

³⁵ Ryan Koronowski, *20 Times Team Trump Denied Any Connections to Russia*, *Think Progress*, July 10, 2017, available at <https://thinkprogress.org/timeline-trumpworld-russia-connection-denials-102adc089438>.

³⁶ Jo Becker, Matt Apuzzo, and Adam Goldman, *Trump Team Met with Lawyer Linked to Kremlin During Campaign*, *New York Times*, July 8, 2017, available at https://www.nytimes.com/2017/07/08/us/politics/trump-russia-kushner-manafort.html?_r=0.

³⁷ *Id.*

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Only an exhaustive investigation into all possible ties, including business and financial ties, between the Trump campaign and administration and Russia will demonstrate whether President Trump and his closest associates conspired with a foreign power to impact the election or whether the administration is subject to foreign influence. We thank you for undertaking your work as special counsel and for considering the matters we have set forth in this letter.

Sincerely,



Noah Bookbinder
Executive Director
Citizens for Responsibility and Ethics in Washington



Ambassador (Ret.) Norman Eisen
Chair
Citizens for Responsibility and Ethics in Washington

cc: Hon. Richard Burr and Hon. Mark Warner, Senate Select Committee on Intelligence
Hon. Mike Conaway and Hon. Adam Schiff, House Permanent Select Committee on Intelligence
Hon. Charles Grassley and Hon. Dianne Feinstein, Senate Committee on the Judiciary
Hon. Robert Goodlatte and Hon. John Conyers, House Judiciary Committee
Hon. Trey Gowdy and Hon. Elijah Cummings, House Committee on Oversight and Government Reform