

Testimony Submitted for the Record
Committee on House Administration
Hearing: “American Confidence in Elections: Prohibiting Foreign Interference”

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Chairman Steil, Ranking Member Morelle, and members of the Committee, thank you for the opportunity to submit testimony regarding the importance of protecting American elections from foreign interference.

My organization, Citizens for Responsibility and Ethics in Washington (CREW), is a nonpartisan nonprofit organization dedicated to fighting corruption and preserving ethical democracy. Among our other work, CREW has been a leader in protecting the integrity of our democracy, including our elections, by identifying and combatting threats of foreign interference in the political process. I write today to call attention to President-elect Donald Trump’s myriad foreign conflicts of interest, and to demonstrate how those conflicts threaten the integrity of American elections.

For the past several years, CREW has documented the shocking extent of President Trump’s entanglements with foreign governments, often through his businesses. Earlier this year, after a review of an incomplete set of President Trump’s financial documents, the Democratic staff of the House Committee on Oversight and Accountability found that President Trump “accepted more than \$7.8 million in payments from foreign states and their leaders” during his first term in the White House.¹ A recent CREW analysis uncovered yet more financial ties, finding that President Trump likely benefited from at least \$13.6 million in payments from 25 foreign nations during his first term.² Of that \$13.6 million, the more than \$5.7 million that President Trump received from the Chinese government stands out given the assessment by intelligence officials, academics, and tech companies that the Chinese government attempted to interfere in the 2024 presidential election by inflaming tensions and stoking divisions among American voters.³ President Trump’s income from Saudi Arabia—which CREW estimates to have been at least \$885,422 during his first

¹ Dem. Staff of H.R. Comm. on Oversight and Accountability, 118th Cong., *White House for Sale: How Princes, Prime Ministers, and Premiers Paid Off President Trump* 9 (2024), <https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/2024-01-04.COA%20DEMS%20-%20Mazars%20Report.pdf>.

² Robert Maguire and Rebecca Jacobs, *Trump likely benefited from \$13.6 million in payments from foreign governments during his presidency*, CREW (Sep. 17, 2024), <https://www.citizensforethics.org/reports-investigations/crew-reports/trump-likely-benefited-from-13-6-million-in-payments-from-foreign-governments-during-his-presidency>.

³ Sheera Frenkel, Tiffany Hsu, and Steven Lee Myers, *How Russia, China and Iran Are Interfering in the Presidential Election*, N.Y. Times (Oct. 29, 2024), <https://www.nytimes.com/2024/10/29/technology/election-interference-russia-china-iran.html>.

term—also raises significant national security concerns given that country’s documented attempts to build up influence operations in the United States as the Kingdom works to rehabilitate its image following the brutal assassination of U.S. resident and journalist Jamal Khashoggi.⁴

President Trump received those funds from foreign nations through his private business interests. As of September 21, 2020, 145 foreign officials from 75 governments visited Trump-owned properties during his first term, including more Turkish officials than representatives of any other country.⁵ One of these visits—by staff of Saudi Crown Prince Mohammed bin Salman—reportedly drove a spike in quarterly profits at the Trump hotel in Manhattan in 2018.⁶ Additionally, foreign governments hosted 13 events at Trump-owned hotels and resorts during President Trump’s first term, bringing 67 foreign officials (and 20 Trump administration officials) to those properties.⁷ Among those 13 events was the Philippine Embassy’s 2018 Independence Day celebration, held at the Trump hotel in Washington D.C., a venue choice which the Philippine Ambassador the United States said was “a statement that we have a good relationship with this president.”⁸ The former president also benefited indirectly from foreign governments during his first term: Trump businesses were granted 67 foreign trademarks during that time period, including 46 trademarks from China.⁹

As President Trump prepares to return to the White House, his financial entanglements with foreign governments remain an ongoing concern. In addition to future visits to and events at Trump properties by foreign governments and officials, and new foreign trademark applications—including a recent application for a trademark in Mexico¹⁰—new

⁴ Adam Lowenstein, *The American PR firm helping Saudi Arabia clean up its image*, The Guardian (Dec. 22, 2022), <https://www.theguardian.com/world/2022/dec/22/edelman-saudi-arabia-pr-image>.

⁵ CREW, *President Trump’s 3,400 conflicts of interest* (Sept. 24, 2020), <https://www.citizensforethics.org/reports-investigations/crew-reports/president-trumps-3400-conflicts-of-interest>.

⁶ David A. Fahrenthold and Jonathan O’Connell, *At President Trump’s hotel in New York, revenue went up this spring – thanks to a visit from big-spending Saudis*, Wash. Post (Aug. 3, 2018), https://www.washingtonpost.com/politics/at-president-trumps-hotel-in-new-york-revenue-went-up-this-spring--thanks-to-a-visit-from-big-spending-saudis/2018/08/03/58755392-9112-11e8-bcd5-9d911c784c38_story.html.

⁷ CREW, *President Trump’s 3,400 conflicts of interest* (Sept. 24, 2020), <https://www.citizensforethics.org/reports-investigations/crew-reports/president-trumps-3400-conflicts-of-interest>.

⁸ Anita Kumar, *Trump can’t stop bragging to foreign leaders about his resorts*, Politico (Oct. 20, 2019), <https://www.politico.com/news/2019/10/20/trump-resorts-emoluments-foreign-leaders-050540>.

⁹ CREW, *President Trump’s 3,400 conflicts of interest* (Sept. 24, 2020), <https://www.citizensforethics.org/reports-investigations/crew-reports/president-trumps-3400-conflicts-of-interest>.

¹⁰ Jordan Libowitz and Rebecca Jacobs, *Trump applied for Mexico trademark on Trump Tower*, CREW (Dec. 13, 2024), <https://www.citizensforethics.org/reports-investigations/crew-investigations/trump-applied-for-mexico-trademark-on-trump-tower>.

potential sources of payments from foreign states to Trump-owned businesses continue to emerge. The Saudi-funded LIV Golf league may continue to host events at Trump-owned properties; LIV Golf has held six events at Trump properties since 2021.¹¹ Though it is unknown exactly how much Trump resorts receive directly from LIV Golf for hosting an event, a single 2022 LIV Golf tournament generated nearly \$800,000 in revenue for the Trump-owned golf club which hosted the event.¹² Elsewhere, a large Trump-branded property in Oman with significant ties to the Omani government is currently under construction and has already generated millions in revenue for Trump businesses.¹³ And in New York, five foreign governments are set to pay nearly \$2 million in monthly fees for units in Trump World Tower throughout the course of President Trump's second term.¹⁴

President Trump's growing collection of foreign conflicts of interest—including with countries who have documented influence campaigns in the United States and have tried to influence the outcome of our elections—severely weakens and degrades our democracy. Multiple national security experts have warned about the risks associated with President Trump's business relationships with foreign nations.¹⁵ These relationships cast doubt on whether President Trump's foreign policy decision making—particularly with respect to nations like China and Saudi Arabia, whose governments have funneled significant funds to Trump-owned businesses—is driven primarily by the public's interest, or President Trump's own private interest. The possibility that President Trump may advance a foreign policy that is in his own personal interest, and the interest of adversarial foreign nations, but adverse to the best interests of the United States, undermines the democratic link between the American people and the president who is supposed to represent them. And if foreign nations know they can influence American foreign policy to their benefit by patronizing the president's businesses, it incentivizes them to influence American elections in an effort to keep that president and his allies in power. If the presidency is for sale, then so too is the integrity of American elections.

¹¹ CREW, *The intensifying threat of Donald Trump's emoluments* (Aug. 28, 2024), <https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments>.

¹² Leo Kamin, *Here's How Much Trump Received For Hosting Saudi-Backed Golf Tournament*, Forbes (July 9, 2024), <https://www.forbes.com/sites/leokamin/2024/07/09/heres-how-much-trump-received-for-hosting-saudi-backed-golf-tournament>.

¹³ CREW, *The intensifying threat of Donald Trump's emoluments* (Aug. 28, 2024), <https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments>.

¹⁴ CREW, *The intensifying threat of Donald Trump's emoluments* (Aug. 28, 2024), <https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments>.

¹⁵ Susan Hennessey, *Ethics Rules Are National Security Rules*, Lawfare (Jan. 10, 2017), <https://www.lawfaremedia.org/article/ethics-rules-are-national-security-rules>; Richard Painter, *Good Governance Paper No. 15: Enforcing the Emoluments Clauses*, Just Security (Oct. 30, 2020), <https://www.justsecurity.org/73148/good-governance-paper-no-15-enforcing-the-emoluments-clauses>.

This threat to American democracy and election integrity is precisely why the framers of our Constitution created the Foreign Emoluments Clause. The Foreign Emoluments Clause prevents the president from receiving, among other things, profits, gains or advantages from foreign governments, without the consent of Congress.¹⁶ The framers recognized, correctly, that a president's loyalty could be compromised by his personal financial interest. By failing to divest from his business interests during his first term President Trump violated the Foreign Emoluments Clause.¹⁷ Should he refuse to divest again, he will continue to be in violation.

American elections are sacred. One of the primary ways we can protect them is to make sure that the president is putting American interests, and the integrity of American elections, before his own private financial interest. Through President Trump's significant financial entanglements with foreign governments who have actively tried to influence American elections and American public opinion, the sacred nature of our elections, and our democracy, is under threat. We thank the Committee for holding this important hearing and look forward to working jointly to make our democracy stronger.

¹⁶ U.S. Const. art. I, § 9, cl. 8.

¹⁷ CREW, *The intensifying threat of Donald Trump's emoluments* (Aug. 28, 2024), <https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments>.