

RESOLUTION

Impeaching Donald John Trump, President of the United States, for high crimes and misdemeanors.

1 *Resolved*, That Donald J. Trump, President of the United
2 States, is impeached for high crimes and misdemeanors, and
3 that the following articles of impeachment be exhibited to the
4 Senate:

5 Articles of impeachment exhibited by the House of
6 Representatives of the United States of America in the name of
7 itself and of the people of the United States of America,
8 against Donald J. Trump, President of the United States of
9 America, in maintenance and support of its impeachment
10 against him for high crimes and misdemeanors.

ARTICLE I

13 **Illegally and unconstitutionally kidnapping and**
14 **imprisoning U.S. residents**

16 In his conduct of the office of President of the United
17 States, Donald J. Trump, in violation of his constitutional oath

Prepared by Free Speech For People

1 faithfully to execute the office of President of the United States
2 and, to the best of his ability, preserve, protect, and defend the
3 Constitution of the United States, and in violation of his
4 constitutional duty to take care that the laws be faithfully
5 executed, has prevented, obstructed, and impeded the
6 administration of justice, in that:

7 Donald J. Trump, using the powers of his high office,
8 engaged personally and through his close subordinates and
9 agents, in a course of conduct or plan to kidnap, arrest, detain,
10 imprison, and, in certain cases, remove from the United States,
11 without any due process and in violation of their constitutional
12 and statutory rights, hundreds of people who peacefully live in
13 our country. In carrying out this assault on immigrants—
14 including refugees, students, and other lawful visa-holders—
15 he has violated the First Amendment, abused the authority of
16 his office to seek retribution against people who hold views
17 with which he does not agree, violated federal immigration
18 law, usurped judicial authority, unconstitutionally impeded
19 local and state authority, and targeted individuals on the basis
20 of their religious, ethnic, or racial identities.

21 The means used to implement this course of conduct or
22 plan included but have not been limited to the following,

1 carried out in coordination with or via his close subordinates:

- 2 1. He unlawfully detained, removed, and paid for the
3 foreign imprisonment of Kilmar Armando Abrego
4 Garcia. Mr. Abrego Garcia fled gang violence in El
5 Salvador as a teenager and is subject to a withholding
6 order under 8 U.S.C. § 1231(b)(3)(A) that forbids his
7 removal to El Salvador because of the high likelihood
8 that he would face persecution there. In direct violation
9 of this order, Mr. Abrego Garcia was arrested by ICE
10 agents, moved across multiple state lines, and flown to
11 El Salvador where he was immediately imprisoned in a
12 maximum security prison that deprives prisoners of
13 human rights, including access to attorneys and
14 visitors, and subjects them to forced labor. Trump is
15 paying \$6 million of U.S. taxpayer dollars annually to
16 El Salvador to imprison immigrants removed from the
17 United States, including Mr. Abrego Garcia. In defiance
18 of multiple court orders, Trump, via senior officials, has
19 refused to facilitate his return.
- 20 2. He unlawfully smuggled Venezuelan migrants out of
21 the United States via planes that took off in secret in
22 order to evade court oversight, and subjected them to

1 unlawful and abusive imprisonment in El Salvador,
2 where they have been denied access to attorneys and
3 other basic rights.¹ At least some of the imprisoned
4 Venezuelans have credible claims for asylum, have no
5 prison records or affiliation with gangs, and came to the
6 United States to escape political and economic
7 oppression.² Hundreds of migrants are now being
8 imprisoned in a maximum security prison in El
9 Salvador without trial or hearing by either government
10 on the unproven assertion by Trump that they are
11 members of a criminal gang. Their unlawful
12 imprisonment is being funded by Trump using taxpayer
13 dollars, who directly or via his close subordinates has
14 entered into an agreement to pay El Salvador to
15 imprison migrants to the United States. None of the
16 imprisoned individuals have been afforded due process
17 or charged with any crime.

¹ The White House, Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua, Mar. 15, 2025, <https://www.whitehouse.gov/presidential-actions/2025/03/invocation-of-the-alien-enemies-act-regarding-the-invasion-of-the-united-states-by-tren-de-aragua/>.

² J.G.G. v. Trump, Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order, Case No. 25-76 (Mar. 15, 2025); Silvia Foster-Frau, *For Four Venezuelan Friends, Alien Enemies Act Cuts Short An American Dream*, Wash. Post, Mar. 18, 2025, <https://www.washingtonpost.com/immigration/2025/03/18/trump-migrants-venezuelans-deportation-bukele/>.

1 3. He unlawfully stripped Rümeyisa Öztürk, Mahmoud
2 Khalil, and other international students of their visas
3 in order to arrest, imprison, and attempt to deport
4 them for expressing views that support Palestine, in
5 violation of the First Amendment and federal
6 immigration law. As part of this scheme, Trump, via
7 his subordinates, has moved these unlawfully
8 imprisoned students across multiple state lines and to
9 remote prisons far from the students' residences to
10 evade judicial oversight and prevent their access to
11 attorneys and their families.

12 To facilitate these illegal detentions, Donald J. Trump has
13 knowingly abused U.S. national security laws to orchestrate
14 unlawful attacks on disfavored speakers and immigrants.
15 Specifically, he directly or through close associates (1)
16 unlawfully invoked the Alien Enemies Act of 1798, 50 U.S.C.
17 ch. 3 § 21, to deport Venezuelans from the United States to El
18 Salvador without adhering to U.S. laws governing the removal
19 of noncitizens; and (2) falsely asserted that international
20 students' pro-Palestine speech had "serious adverse foreign
21 policy consequences for the United States" to justify the

1 withdrawal of their visas and residency statues, 8 U.S.C. §
2 1227(a)(4)(C)(i).

3 In all of this, Donald J. Trump has acted in a manner
4 contrary to his trust as President and subversive of
5 constitutional government, to the great prejudice of the cause
6 of law and justice and to the manifest injury of the people of
7 the United States.

8 Wherefore Donald J. Trump, by such conduct, warrants
9 impeachment and trial, and removal from office.

10
11 ARTICLE II

12 **Illegally and unconstitutionally removing U.S.**
13 **residents, migrants, and asylum-seekers to foreign**
14 **prisons**

15
16 In his conduct of the office of President of the United
17 States, Donald J. Trump, in violation of his constitutional oath
18 faithfully to execute the office of President of the United States
19 and, to the best of his ability, preserve, protect, and defend the
20 Constitution of the United States, and in violation of his
21 constitutional duty to take care that the laws be faithfully
22 executed, has prevented, obstructed, and impeded the
23 administration of justice, in that:

Donald J. Trump, using the powers of his high office, engaged personally and through his close subordinates and agents, in a course of conduct or plan to remove people from the United States, pay foreign governments to imprison them in foreign prisons or camps without due process, and disavow responsibility for the prisoners, including the responsibility to return them to U.S. soil when ordered to do so by U.S. courts. In furtherance of this scheme, Donald J. Trump, directly or through his close subordinates, has:

1. Paid El Salvador \$6 million using U.S. taxpayer dollars to accept and imprison more than 230 mostly Venezuelan men who sought refuge in the United States. These men remain imprisoned in an overcrowded maximum security prison known as Centro de Confinamiento del Terrorismo (CECOT) and are being deprived of basic human rights, including access to attorneys. Senior officials and close allies of Trump ordered or were otherwise involved in smuggling the migrants out of the United States via planes that took off in secret and in order to evade court oversight. Although Trump and senior officials within his administration claim that these individuals

1 are members of a Venezuelan gang, they have not
2 presented any evidence in a court of law to support
3 these claims.

- 4 2. Forcibly and unlawfully removed Kilmar Armando
5 Abrego Garcia to CECOT, in violation of a court order
6 prohibiting Mr. Abrego Garcia's removal to El Salvador,
7 a country he fled as a child to escape persecution of El
8 Salvadoran gangs. Senior Trump officials have refused
9 to orchestrate or facilitate his return, in defiance of
10 multiple court orders and despite the fact that his
11 imprisonment was facilitated and continues to be paid
12 for by the United States government using U.S.
13 taxpayer dollars, and he remains unlawfully
14 imprisoned under abusive, inhumane conditions.
- 15 3. Arrested, shackled, and forcibly removed more than one
16 hundred migrants, including children, to Panama
17 because their countries of origin would not accept them.
18 The migrants were stripped of their passports, barred
19 from seeing attorneys, and locked as prisoners first in a
20 hotel and then in a remote encampment in the jungle.³

³ Julie Turkewitz et al, "Migrants, Deported to Panama Under Trump Plan, Detained in Remote Jungle Camp," NY Times, Feb. 19, 2015, <https://www.nytimes.com/2025/02/19/world/americas/us-migrants-panama-jungle-camp.html>.

1 4. Engaged in ongoing efforts to remove Venezuelan men
2 to be imprisoned in CECOT in El Salvador without due
3 process, including by moving immigrants between
4 immigration detention facilities to evade U.S. court
5 oversight.

6 5. Announced plans to expand this scheme to include the
7 removal of U.S. citizens to be imprisoned in El
8 Salvador, specifically by telling Salvadoran President
9 Bukele that “[t]he homegrowns are next You’ve got
10 to build about five more places.”⁴

11 The imprisonment of migrants to the United States in
12 foreign prisons and the plans to imprison U.S. citizens in
13 foreign prisons deprive prisoners of the rights afforded to them
14 by the U.S. Constitution and constitute a direct assault on the
15 rule of law in this country. As was explained in a unanimous
16 three-judge ruling of the U.S. Court of Appeals for the Fourth
17 Circuit in Mr. Abrego Garcia’s case:

18 If today the Executive claims the right to deport
19 without due process and in disregard of court order,
20 what assurances will there be tomorrow that it will

⁴ Kyle Cheney et al., “Trump, In A Rare Move, Deferred to Another World Leader. It’s a Clear Legal Play,” Politico, Apr. 14, 2025, <https://www.politico.com/news/2025/04/14/trump-bukele-sidestep-court-orders-00290220>.

1 not deport American citizens and then disclaim
2 responsibility to bring them home? And what
3 assurances shall there be that the Executive will not
4 train its broad discretionary power upon its political
5 enemies? The threat, even if not the actuality, would
6 always be present, and the Executive's obligation to
7 'take Care that the Laws be faithfully executed'
8 would lose its meaning.⁵

9
10 Despite the Fourth Circuit's ruling and the warning
11 contained therein, Donald J. Trump has refused to facilitate,
12 orchestrate, or even demand the return of Mr. Abrego Garcia
13 to the United States, and has not withdrawn his request that
14 the Salvadoran President build more prisons to hold U.S.
15 citizens.

16 In all of this, Donald J. Trump has acted in a manner
17 contrary to his trust as President and subversive of
18 constitutional government, to the great prejudice of the cause
19 of law and justice and to the manifest injury of the people of
20 the United States.

⁵ Abrego Garcia v. Noem, No. 25-1404, 2025 WL 1135112, at *2 (4th Cir. Apr. 17, 2025).

1 Wherefore Donald J. Trump, by such conduct, warrants
2 impeachment and trial, and removal from office.

3
4 ARTICLE III

5 **Unlawfully and unconstitutionally attempting to**
6 **deport immigrants for peacefully protesting.**
7

8 In his conduct of the office of President of the United
9 States, Donald J. Trump, in violation of his constitutional oath
10 faithfully to execute the office of President of the United States
11 and, to the best of his ability, preserve, protect, and defend the
12 Constitution of the United States, and in violation of his
13 constitutional duty to take care that the laws be faithfully
14 executed, has prevented, obstructed, and impeded the
15 administration of justice, in that:

16 Donald J. Trump, using the powers of his high office,
17 engaged personally and through his close subordinates and
18 agents, in a course of conduct or plan designed to violate the
19 First Amendment rights of lawfully admitted permanent
20 residents and other individuals who are lawfully present in
21 this country, and to violate federal immigration law to the
22 harm and detriment of our country's lawful residents.

23 The means used to implement this course of conduct or

1 plan include the unlawful arrests, detentions, and ongoing
2 attempts to deport Mahmoud Khalil, Rümeyza Öztürk, and
3 other international students because they have exercised their
4 rights under the First Amendment.

5 All immigrants residing in this country are accorded
6 “[f]reedom of speech and of press.” *Bridges v. Wixon*, 326 U.S.
7 135 (1945). Lawfully admitted permanent residents, including
8 Mr. Khalil, have been afforded “the status of having been
9 lawfully accorded the privilege of residing permanently in the
10 United States as an immigrant,” 8 U.S.C. § 1101(a)(20) and
11 can be deported only in limited circumstances, none of which
12 have been satisfied by Trump or the U.S. State Department
13 with regard to Mr. Khalil. People studying in the United
14 States on student visas, like Ms. Öztürk, may be deported for a
15 broader but still limited range of circumstances, none of which
16 have been satisfied by Trump or the U.S. Department of State
17 with regard to Ms. Öztürk. They may not be persecuted,
18 stripped of their visas, detained, or deported for exercising
19 their First Amendment rights.

20 Secretary of State Marco Rubio has asserted that the
21 administration intends to deport any green card holder who

1 participates in pro-Palestine protests.⁶ The arrest,
2 imprisonment, and threatened deportation of Mr. Khalil, Ms.
3 Öztürk, and other immigrants who engage in peaceful protests
4 is a direct assault on the First Amendment of the U.S.
5 Constitution and on federal immigration law, which strictly
6 limits the grounds on which the government may rely in
7 seeking to revoke a person's visa or permanent residency
8 status.

9 In all of this, Donald J. Trump has acted in a manner
10 contrary to his trust as President and subversive of
11 constitutional government, to the great prejudice of the cause
12 of law and justice and to the manifest injury of the people of
13 the United States.

14 Wherefore Donald J. Trump, by such conduct, warrants
15 impeachment and trial, and removal from office.
16

17 ARTICLE IV

18 **Unconstitutionally usurping Congress's powers**

19

20 In his conduct of the office of President of the United

⁶ Marco Rubio, @marcorubio, X (Mar. 9, 2025, 6:10PM,
<https://x.com/marcorubio/status/1898858967532441945> ("We will be revoking the visas
and/or green cards of Hamas supporters in America so they can be deported."))

1 States, Donald J. Trump, in violation of his constitutional oath
2 faithfully to execute the office of President of the United States
3 and, to the best of his ability, preserve, protect, and defend the
4 Constitution of the United States, and in violation of his
5 constitutional duty to take care that the laws be faithfully
6 executed, has engaged in a corrupt course of conduct that
7 demonstrates his unfitness to serve as President of the United
8 States, in that:

9 Donald J. Trump, using the powers of his high office,
10 engaged personally and through his close subordinates and
11 agents in a course of conduct or plan designed to undermine
12 and usurp the authority and powers vested in Congress by
13 Article I of the U.S. Constitution.

14 The means used to implement this course of conduct or
15 plan included the following, carried out in coordination with or
16 via his close subordinates:

- 17 1. He created a position of authority in and over federal
18 agencies that qualifies the officeholder as an officer of
19 the United States and installed Elon Musk in that
20 position, in violation of the Advice and Consent Clause
21 of the U.S. Constitution, Art. II, sec. 2, cl. 2. The
22 Constitution provides Congress alone with the power to

1 establish “public Ministers and consuls . . . and all
2 other Officers of the United States . . . which shall be
3 established by Law.” Art. II, sec. 2, cl. 2. A President
4 may nominate a person to any such position only “by
5 and with the Advice and Consent of the Senate.” *Id.*
6 Trump usurped both powers by creating a new position
7 in his Cabinet and installing Elon Musk in that
8 position. The extensive powers that have been afforded
9 to Musk in that position belie any claim by Trump that
10 Musk is not an Officer of the United States; the U.S.
11 Supreme Court has long recognized that “any appointee
12 exercising significant authority pursuant to the laws of
13 the United States is an ‘Officer of the United States,’
14 and must, therefore, be appointed in the manner
15 prescribed by [Art. II, sec. 2, cl. 2].” *Buckley v. Valeo*,
16 424 U.S. 1, 126 (1976). The harms that result from the
17 usurpation of Congress’s power are extensive,
18 undermining not just a single branch but the
19 democracy itself: “The structural interests protected by
20 the Appointments Clause are not those of any one
21 branch of Government but of the entire Republic.”
22 *Freytag v. C.I.R.*, 501 U.S. 868, 880 (1991).

1 2. He has usurped the power of Congress and defied
2 Congress and the Judiciary by blocking the distribution
3 of trillions of dollars in funds that have been
4 appropriated by Congress under Congress’s exclusive
5 constitutional authority, U.S. Const. art. 1, sec. 8, cl. 1
6 & art. 1, sec. 9, cl. 7; and has refused to disburse these
7 appropriated funds even when ordered to do so by
8 federal courts.⁷ Congress is broadly authorized and
9 required by the Constitution to “provide for the
10 common Defence and general Welfare of the United
11 States,” U.S. Const. art. 1, sec. 8, cl. 1, and the
12 President has long been prohibited from refusing to
13 spend funds appropriated by Congress. By blocking
14 funds committed by Congress to meet these purposes,
15 Trump has violated the Constitution, usurped
16 congressional power, and undermined the wellbeing of

⁷ *National Council of Nonprofits v. Office of Management and Budget*, Memorandum Op., Case No. 25-cv-239 (D.D.C. Feb. 25, 2025) (noting that White House Press Secretary Karoline Leavitt publicly announced that the federal funding freeze remained in effect even after the court issued an administrative stay to prohibit Defendants from implementing the freeze on pertinent funds); *New York v. Trump*, Order, Case No. 25-cv-39 (D.R.I. Feb. 20, 2025) (granting plaintiffs’ motion for enforcement of the temporary restraining order because defendants had not yet complied with the order); *AIDS Vaccine Advocacy Coalition v. U.S. Department of State*, Order, Case No. 25-cv-400 (D.D.C. Feb. 13, 2025) (ordering disbursement of foreign assistance funds that were in place before Trump took office); Zach Montague, *Judge Gives Trump Administration deadline to Release Foreign Aid*, NY Times (Feb. 25, 2025) (detailing administration’s refusal to adhere to court orders).

1 the United States and the American people.

2 3. He has usurped the power of Congress by imposing
3 tariffs of up to 25% on Canada and Mexico, 10% tariffs
4 on nearly all imported goods, additional tariffs of up to
5 50% on nearly ninety countries, and tariffs and
6 retaliatory tariffs of up to 145% on goods from China;
7 and by engaging in schemes to pause, rescind, modify,
8 and re-impose tariffs. The authority to impose tariffs is
9 vested solely in Congress, *see* U.S. Const. art. I, § 8,
10 which provides that Congress “shall have power to lay
11 and collect taxes, duties, imposts and excises, to pay
12 the debts and provide for the common defense and
13 general welfare of the United States.” Though Congress
14 may and has in certain circumstances delegated tariff
15 authority to the President via statute, it has not done
16 so here. Trump’s abrupt and multiple tariff orders have
17 undermined the country’s economic stability, its
18 relationship with significant trading partners, and
19 harmed Americans’ financial security.

20 In all of this, Donald J. Trump has acted in a manner
21 contrary to his trust as President and subversive of
22 constitutional government, to the great prejudice of the cause

1 of law and justice and to the manifest injury of the people of
2 the United States.

3 Wherefore Donald J. Trump, by such conduct, warrants
4 impeachment and trial, and removal from office.

6 ARTICLE V

7 **Defying court orders and usurping judicial authority**

8
9 In his conduct of the office of President of the United
10 States, Donald J. Trump, in violation of his constitutional oath
11 faithfully to execute the office of President of the United States
12 and, to the best of his ability, preserve, protect, and defend the
13 Constitution of the United States, and in violation of his
14 constitutional duty to take care that the laws be faithfully
15 executed, has engaged in a corrupt course of conduct that
16 demonstrates his unfitness to serve as President of the United
17 States, in that:

18 Donald J. Trump, using the powers of his high office,
19 engaged personally and through his close subordinates and
20 agents in a course of conduct or plan designed to undermine
21 and usurp the authority and powers vested in the Judiciary by
22 Article III of the U.S. Constitution.

1 The means used to implement this course of conduct or
2 plan included the following, carried out in coordination with or
3 via his close subordinates:

- 4 1. He refused to comply with multiple court orders,
5 including from the United States Supreme Court, to
6 facilitate the return of Kilmar Armando Abrego Garcia
7 back to the United States from El Salvador, despite the
8 fact that he orchestrated Mr. Abrego Garcia’s arrest and
9 removal to El Salvador in violation of a long-term
10 “withholding of removal” court order, arranged for his
11 imprisonment in a Salvadoran maximum security prison,
12 and is paying El Salvador to imprison people—including
13 Mr. Abrego Garcia—who have been removed from the
14 United States.
- 15 2. He refused to comply with multiple court orders to
16 suspend the foreign-assistance funding freeze and release
17 \$2 billion in funding to foreign aid projects.⁸
- 18 3. He refused to wholly or promptly comply with multiple
19 court orders to suspend all categorical pauses or freezes to
20 federal funding by the Office of Management and Budget

⁸ U.S. Dep’t of State, v. AIDS Vaccine Advocacy Coalition, 604 U.S. ____ (2025); AIDS Vaccine Advocacy Coalition v. U.S. Dep’t of State, Joint Status Report, Case No. 25-cv-400 (filed Mar. 14, 2025); AIDS Vaccine Advocacy Coalition v. U.S. Department of State, Joint Status Report, Case No. 25-cv-400 (filed Mar. 6, 2025).

1 and resume disbursement of appropriated federal funds.⁹

2 4. He unlawfully removed 261 Venezuelan immigrants to El
3 Salvador for immediate imprisonment, in open defiance of
4 a court order,¹⁰ and demanding the judge's impeachment
5 solely because Trump disagrees with the judge's ruling.

6 5. He abruptly and unlawfully removed Dr. Rasha Alawieh,
7 a kidney transplant specialist and Brown University
8 medical school professor with a valid work visa to be in
9 the United States, either in defiance of a court order
10 blocking her deportation or in disregard of the court
11 proceedings and knowledge of an imminent court order.¹¹

12 6. In an effort to undermine the courts and intimidate
13 judges, he repeatedly asserted that the administration is
14 not bound by court orders and demanded the

⁹ New York v. Trump, Order, Case No. 25-cv-39 (Feb. 10, 2025); National Council of Nonprofits v. Office of Management Budget, Memorandum Opinion, Case No. 25-239 (Feb. 25, 2025).

¹⁰ Luke Broadwater et al., *A Judge Ordered Deportation Planes to Turn Around. The White House Didn't Listen*, N.Y. Times, Mar. 17, 2025, <https://www.nytimes.com/2025/03/17/us/politics/timeline-trump-deportation-flights-el-salvador.html>; Alan Feuer, *Trump Administration Pushes Back Against Judge's Orders on Deportations*, N.Y. Times, Mar. 18, 2025, <https://www.nytimes.com/2025/03/18/us/politics/trump-venezuela-deportations-doj-court-order.html>; Alison Main et al, *Trump Administration Depots Hundreds of Alleged Gang Members to El Salvador Despite Court Rulings*, CNN, Mar. 17, 2025, <https://www.cnn.com/2025/03/16/politics/trump-administration-deportations-alien-enemies-act/index.html>; J.G.G. v. Trump, Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order, Case No. 25-76 (Mar. 15, 2025).

¹¹ Dana Goldstein, *Brown University Professor is Deported Despite a Judge's Order*, N.Y. Times, Mar. 16, 2025, <https://www.nytimes.com/2025/03/16/us/brown-university-rasha-professor-deported.html>.

1 impeachment and removal of judges that ruled against
2 him and officials within his administration, even as these
3 judges face ongoing and increasing threats of violence,¹²
4 with Trump personally calling one judge “a troublemaker
5 and agitator,” and falsely identifying as “Crooked” those
6 judges he is “forced to appear before.”¹³

7
8 The judiciary is afforded power, in relevant part, over “all
9 Cases, in Law and Equity, arising under this Constitution, the
10 Laws of the United States, and Treaties made” and “to
11 Controversies to which the United States shall be a Party.”
12 U.S. Const. art. III, sec. 2. Refusing to adhere to court orders,
13 intimidating of judges, and recklessly calling for the
14 impeachment and removal of judges who disagree with him
15 demonstrate a willingness by Trump to usurp authority
16 afforded by our Constitution to the judiciary and demonstrate

¹² JD Vance @JDVance, X (Feb. 9, 2025, 10:13AM), <https://x.com/JDVance/status/1888607143030391287>; Carrie Johnson, *Judges Threatened With Impeachment, Bombs For Ruling Against Trump Agenda*, Mar. 14, 2025, <https://www.npr.org/2025/03/13/nx-s1-5316340/threats-judges-trump>; Press Release, Statement from Attorney General Pamela Bondi on Federal Judge Blocking Deportations, Mar. 15, 2025, <https://www.justice.gov/opa/pr/statement-attorney-general-pamela-bondi-federal-judge-blocking-deportations>; Nicholas Riccardi, *Trump Administration Ramps Up Rhetoric Targeting the Courts Amid Mounting Legal Setbacks*, AP News, Mar. 16, 2025, <https://apnews.com/article/trump-courts-judges-rule-of-law-85058a5ffcef105d4ea2ce0ef078f084>; Reuters, *US Judges Alarmed Over Rise in Violent Threats as Trump and Musk Lambast Them*, The Guardian, Mar. 6, 2025, <https://www.theguardian.com/us-news/2025/mar/06/us-judges-threats-trump-musk>.

¹³ Donald J. Trump @realDonaldTrump, Truth Social (Mar. 18, 2025, 9:05AM).

1 a disregard for the Constitution and the careful balance of
2 powers that protects our country from abuses by any single
3 branch.

4 In all of this, Donald J. Trump has acted in a manner
5 contrary to his trust as President and subversive of
6 constitutional government, to the great prejudice of the cause
7 of law and justice and to the manifest injury of the people of
8 the United States.

9 Wherefore Donald J. Trump, by such conduct, warrants
10 impeachment and trial, and removal from office.

11
12 ARTICLE VI

13 **Terminating DOJ and FBI officials based on**
14 **retribution**
15

16 In his conduct of the office of President of the United
17 States, Donald J. Trump, in violation of his constitutional oath
18 faithfully to execute the office of President of the United States
19 and, to the best of his ability, preserve, protect, and defend the
20 Constitution of the United States, and in violation of his
21 constitutional duty to take care that the laws be faithfully
22 executed, has prevented, obstructed, and impeded the

1 administration of justice, in that:

2 Donald J. Trump, using the powers of his high office,
3 engaged personally and through his close subordinates and
4 agents in a course of conduct or plan designed to obtain
5 retribution for lawful investigations into his own corrupt or
6 unlawful activities, and to cover up, conceal, and protect
7 himself and other parties involved in these activities.

8 The means used to implement this course of conduct or
9 plan included the following, carried out in coordination with or
10 via his close subordinates:

- 11 1. Firing at least twelve nonpartisan public career
12 prosecutors in the U.S. Department of Justice (DOJ)
13 who were lawfully authorized to work on at least one of
14 two federal prosecutions against Trump, specifically a
15 case related to Trump's interference in the 2020
16 election and a case related to his improper and
17 unlawful retention of records after he left office. At the
18 time of their termination, then-Acting Attorney
19 General James McHenry explained that these officials
20 were fired because of their involvement in these
21 prosecutions and asserted that they therefore could
22 "not be trust[ed] . . . to assist in faithfully implementing

1 the President's agenda."

- 2 2. Firing nonpartisan public servants in the Federal
3 Bureau of Investigation (FBI) who investigated Donald
4 Trump for election interference and the unlawful
5 retention of documents, as well as nonpartisan officials
6 in charge of at least five FBI field offices.
- 7 3. Firing FBI agents and approximately twenty-four DOJ
8 prosecutors, all of whom were nonpartisan career
9 public servants, who worked on the investigation and
10 prosecution of cases stemming from the January 6,
11 2021 attack on the Capitol. In this matter, Donald J.
12 Trump has sought retribution against federal
13 prosecutors for carrying out their duties with regard to
14 the investigation and prosecution of his co-
15 insurrectionists.
- 16 4. Demanding from then-acting director of the FBI a full
17 list of thousands of authorized investigative officers
18 and employees of the FBI for the purpose of carrying
19 out "a review process to determine whether any
20 additional personnel actions are necessary" solely
21 because they were assigned to and did carry out duties
22 related to the January 6 insurrection investigations.

5. Terminating, reassigning, and demoting thousands of FBI and U.S. DOJ officials, thereby undermining the independence of both agencies and the security of the United States.

In all of this, Donald J. Trump has acted in a manner contrary to his trust as President and subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

ARTICLE VII

Co-opting and dismantling federal agencies for corrupt purposes

In his conduct of the office of President of the United States, Donald J. Trump, in violation of his constitutional oath faithfully to execute the office of President of the United States and, to the best of his ability, preserve, protect, and defend the Constitution of the United States, and in violation of his constitutional duty to take care that the laws be faithfully

1 executed, has engaged in a corrupt course of conduct that
2 demonstrates his unfitness to serve as President of the United
3 States, in that:

4 Donald J. Trump, using the powers of his high office,
5 engaged personally and through his close subordinates and
6 agents in a course of conduct or plan designed to prevent
7 independent government oversight of his own business entities
8 and those of his benefactors.

9 The means used to implement this course of conduct or
10 plan included the following, carried out in coordination with or
11 via his close subordinates:

- 12 1. He has limited the effective operations of agencies
13 tasked with overseeing and investigating businesses
14 operated by Elon Musk, the richest man in the world
15 and Trump's single largest billionaire benefactor. With
16 the encouragement and complicity of Trump, Musk
17 gave approximately \$260 million in contributions to his
18 own super PACs to support Trump's 2024 election
19 campaign;¹⁴ purchased the world's largest social media
20 company, Twitter, now X, and converted it into a

¹⁴ Trisha Thadani et al., *Elon Musk Donated \$288 Million in 2024 Election, Final Tally Shows*, Wash. Post (Jan. 31, 2025),
<https://www.washingtonpost.com/politics/2025/01/31/elon-musk-trump-donor-2024-election/>.

1 vehicle to promote Trump's 2024 campaign, reinstating
2 Trump's privileges on Twitter, from which he had been
3 banned following his incitement of the January 6, 2021,
4 insurrection and permitting and promoting a massive
5 disinformation campaign to support Trump's election in
6 2024; and engaged in an unlawful million dollar lottery
7 scheme to bribe voters to vote for Trump in 2024.

8 Musk and his businesses have 100 contracts with 17
9 federal agencies accounting for at least \$15.4 billion.¹⁵

10 a. He has appointed Elon Musk to be a special
11 government employee in charge of the newly
12 established Department of Government Efficiency
13 (DOGE).¹⁶ DOGE has been given access to agency
14 data and has either authorized or issued advice
15 that Trump or his agency directors have acted
16 upon to terminate thousands of employees, freeze

¹⁵ Eric Lipton et al., *U.S. Agencies Fund, and Fight With, Elon Musk. A Trump Presidency Could Give Him Power Over Them*, N.Y. Times (updated Oct. 21, 2024), <https://www.nytimes.com/2024/10/20/us/politics/elon-musk-federal-agencies-contracts.html>. SpaceX has at least \$15.4 billion in government contracts; Tesla has at least \$352,000 in government contracts.

¹⁶ Executive Order 14158 (Jan. 20, 2025), <https://www.federalregister.gov/documents/2025/01/29/2025-02005/establishing-and-implementing-the-presidents-department-of-government-efficiency>; Joe Hernandez, *Trump Hired Musk as a 'Special Government Employee.' Here's What That Means*, NPR.org (Feb. 13, 2025), <https://www.npr.org/2025/02/13/nx-s1-5293124/special-government-employee-trump-musk-doge>.

trillions of dollars in federal grant funds, and limit agency activities.¹⁷ Many of these agencies have oversight of Musk’s companies or contract with Musk’s companies.¹⁸

b. He fired the National Labor Relations Board’s (NLRB) General Counsel and one Democratic NLRB Board Member without “notice and hearing,” and without specific claim of “neglect of duty or malfeasance in office,” as required by federal law, 29 U.S.C. § 153(a), leaving the NLRB with insufficient members to establish quorum to adjudicate cases.¹⁹ The NLRB was pursuing approximately 24 investigations into Musk-controlled companies SpaceX, Tesla, and X and had filed a case against SpaceX; Musk sued NLRB in response to the lawsuit.

¹⁷ See Meg Kinnard, *A Comprehensive Look at DOGE’s Firings and Layoffs So Far*, AP News (Feb. 21, 2025), <https://apnews.com/article/doge-firings-layoffs-federal-government-workers-musk-d33cdd7872d64d2bdd8fe70c28652654>.

¹⁸ See Eric Lipton & Kirsten Grind, *Elon Musk’s Business Empire Scores Benefits Under Trump Shake-Up*, NY Times (Feb. 11, 2025), <https://www.nytimes.com/2025/02/11/us/politics/elon-musk-companies-conflicts.html>; *Fact Sheet: Trump Administration, DOGE Punish Agencies Investigating Elon Musk’s Companies*, Democrats House Comm. on the Judiciary, https://democrats-judiciary.house.gov/uploadedfiles/2025.02.13_fact_sheet_re_musk_investigations.pdf; Kimberly Kindy & Brian Slodysko, *Key Things To Know About How Tesla Could Benefit From Elon Musk’s Assault on Government*, AP News (Feb. 11, 2025).

¹⁹ *New Process Steel v. NLRB*, 560 U.S. 674 (2010); 29 U.S.C. § 153(b).

1 c. On January 21, 2025, Trump issued an Executive
2 Order that ceased Office of Federal Contract
3 Compliance Programs (OFCCP) operations before
4 its 2024 investigation into Tesla, a Musk-owned
5 company, could be concluded or its results be made
6 public.²⁰ The OFCCP, established by President
7 Johnson in 1965,²¹ enforces equal employment
8 laws for federal contractors.

9 d. Trump has fired two Democratic, Senate-
10 confirmed commissioners of the bipartisan Equal
11 Employment Opportunity Commission (EEOC) in
12 the middle of their terms without “notice and
13 hearing, for neglect of duty or malfeasance in
14 office” as required by law, 29 U.S.C. § 153(a),
15 which leaves the EEOC without quorum.²² EEOC
16 is charged with protecting employees from
17 unlawful and discriminatory hiring practices,²³
18 and sued Tesla for racial harassment and

²⁰ Executive Order 14173 (Jan. 21, 2025),
<https://www.federalregister.gov/documents/2025/01/31/2025-02097/ending-illegal-discrimination-and-restoring-merit-based-opportunity>.

²¹ Exec. Order No. 11246, 3 C.F.R. 339 (1964 65), *reprinted in* 42 U.S.C. 2000e note (1994).

²² 42 U.S.C. §2000e-4(c).

²³ 42 U.S.C. § 2000e-2(a)-(b).

1 retaliation at its Fremont, California

2 manufacturing facilities in 2023.²⁴

3 e. The Trump administration suspended all
4 investigative work and other critical operations by
5 the Consumer Financial Protection Bureau
6 (CFPB), shut its headquarters,²⁵ and fired dozens
7 of workers.²⁶ Employees of DOGE were granted
8 access to sensitive data held by CFPB, including
9 the agency's human resources, procurement, and
10 financial information.²⁷ The day after DOGE
11 obtained access to CFPB, Musk tweeted "CFPB
12 RIP."²⁸ The CFPB is tasked with implementing
13 and enforcing Federal consumer financial law to

²⁴ *EEOC v. Tesla, Inc.*, Case No. 4:23-cv-4984 (N.D. Cal. 2023).

²⁵ Laurel Wamsley, *Treasury Secretary Bessent, Tapped to Run CFPB, Orders Staff to Halt Work*, NPR.org (Feb. 4, 2025), <https://www.npr.org/2025/02/03/nx-s1-5285356/treasury-secretary-bessent-acting-cfpb-director>; Christopher Rugaber, *Trump Administrator Orders Consumer Protection Agency to Stop Work, Closes Building*, AP News (Feb. 9, 2025), <https://apnews.com/article/trump-consumer-protection-cease-1b93c60a773b6b5ee629e769ae6850e9>.

²⁶ Lauren Feiner, *The Technology Team at Financial Regulator CFPB Has Been Gutted*, The Verge (Feb. 14, 2025), <https://www.theverge.com/policy/612933/cfpb-tech-team-gutted-trump-doge-elon-musk>.

²⁷ CFPB Union Sounds Alarm: Urgent Action Needed to Protect Sensitive Consumer and Industry Data, CFPB Union NTE 335 (Feb. 7, 2025), <https://nteu335.org/2025/02/07/cfpb-union-sounds-alarm-urgent-action-needed-to-protect-sensitive-consumer-and-industry-data/>; Makena Kelly, *DOGE Is Now Inside The Consumer Financial Protection Bureau*, Wired (Feb. 7, 2025), <https://www.wired.com/story/doge-access-consumer-financial-protection-bureau-data/>.

²⁸ Holly Otterbein & Katy O'Donnell, *'CFPB RIP': Elon Musk Is Already Descending On His Next Target*, Politico (Feb. 7, 2025), <https://www.politico.com/news/2025/02/07/elon-musk-team-cfpb-00203119>.

1 ensure that “markets for consumer financial
2 products and services are fair, transparent, and
3 competitive,” and to exercise its authority to
4 ensure that consumers “are protected from unfair,
5 deceptive, or abusive acts and practices and from
6 discrimination,” by banks and other financial
7 service providers.²⁹ Had CFPB not been ordered to
8 stop work, it would have regulated Musk-
9 controlled X’s planned mobile payment services,
10 and had authority to investigate and oversee
11 privacy issues, fraud, and disputed transaction
12 policies on all mobile payment applications.³⁰ The
13 CFPB also supervised the auto lending industry
14 and was in receipt of nearly 300 complaints
15 against Tesla.³¹

16 f. Donald J. Trump, via or on advice of DOGE, has
17 laid off or bought out between 4 and 10% of
18 National Highway Traffic Safety Administration

²⁹ 12 U.S.C. § 5511(a), (b).

³⁰ Bobby Allyn, *Elon Musk’s DOGE Takes Aim at Agency That Had Plans of Regulating X*, NPR.org (Feb. 12, 2025), <https://www.npr.org/2025/02/12/nx-s1-5293382/x-elon-musk-doge-cfpb>.

³¹ Eric Lipton & Kirsten Grind, *Elon Musk’s Business Empire Scores Benefits Under Trump Shake-Up*, NY Times (Feb. 11, 2025), <https://www.nytimes.com/2025/02/11/us/politics/elon-musk-companies-conflicts.html>.

employees, including 3 of the 7 experts in an office that oversees the safety of autonomous vehicles.³² The National Highway Traffic Safety Administration has three active investigations of Tesla, including one examining the safety of the company's autonomous driving software in poor-visibility conditions.³³ These terminations cut nearly in half the capacity of and expertise in an agency tasked with overseeing Tesla and all companies that are seeking to use autonomous vehicle technology.

2. Donald J. Trump ordered the unlawful termination of more than 17 duly appointed inspectors general of eight U.S. agencies,³⁴ who served as nonpartisan public servants charged with preventing government waste,

³² Jack Ewing, *Officials Are Fired at Traffic Safety Agency Investigating Musk's Company*, NY Times (Feb. 22, 2025), <https://www.nytimes.com/2025/02/22/business/traffic-safety-agency-firings-elon-musk.html>; Ian Duncan, *DOGE Employee Cuts Fall Heavily On Agency That Regulates Musk's Tesla*, Wash. Post (Feb. 20, 2025), <https://www.washingtonpost.com/business/2025/02/21/musk-doge-tesla-autonomous-vehicles-nhtsa/>.

³³ Ian Duncan, *DOGE Employee Cuts Fall Heavily On Agency That Regulates Musk's Tesla*, Wash. Post (Feb. 20, 2025), <https://www.washingtonpost.com/business/2025/02/21/musk-doge-tesla-autonomous-vehicles-nhtsa/>; Ian Duncan & Aaron Gregg, *Crashes Involving Tesla's Full Self-Driving Prompt New Federal Probe*, Wash. Post (Oct. 18, 2024), <https://www.washingtonpost.com/business/2024/10/18/tesla-full-self-driving-nhtsa-fsd/>.

³⁴ Zeke Miller et al., *Trump Uses Mass Firing To Remove Independent Inspectors General at Various Agencies*, Time (Jan. 8, 2025), <https://time.com/7210016/trump-mass-firing-removes-independent-inspectors-general/>.

1 fraud, and abuse by carrying out independent audits
2 and investigations of their respective agencies’
3 operations, personnel, and contracts with external
4 entities. They were terminated without notice to
5 Congress and without case-specific rationale for their
6 terminations, in violation of federal law.³⁵ The removal
7 of nonpartisan inspectors general limits agencies’
8 ability to prevent, detect, and prosecute fraud, waste,
9 and corruption; and to investigate corporations—
10 including those owned by Trump, Musk, or other
11 Trump allies and benefactors—with whom the agencies
12 contract or whose operations fall under the agency’s
13 purview. Inspectors General from the Department of
14 Labor, the Environmental Protection Agency, the U.S.
15 Agency for International Development, the Department
16 of Transportation, and the U.S. Department of
17 Agriculture were all terminated after or while their
18 agencies or agencies within their purview carried out
19 investigations against Musk-owned companies. Musk

³⁵ 5 U.S.C. § 403(b) (“If an Inspector General is removed from office . . . the President shall communicate in writing the substantive rationale, including detailed and case-specific reasons for any such removal or transfer to both Houses of Congress (including the appropriate congressional committees), not later than 30 days before the removal or transfer.”)

1 also has lucrative contracts with agencies whose
2 inspectors general were terminated, including the
3 Department of Defense.

- 4 3. Trump prohibited the Department of Justice from
5 undertaking any new investigations or enforcement
6 actions for at least 180 days under the Foreign Corrupt
7 Practices Act,³⁶ a federal law that prohibits U.S.
8 corporations and individuals from bribing foreign
9 government officials in order to obtain or retain
10 business with a foreign government.³⁷ Trump's
11 Executive Order also orders the U.S. Attorney General
12 to review ongoing existing FCPA investigations and
13 enforcement actions, and authorizes him to extend the
14 moratorium by an additional 180 days. The prohibition
15 will enable businesses controlled by Trump, his family,
16 and his allies to bribe foreign governments to obtain
17 business advantages with no legal consequences.
- 18 4. The DOJ has moved to dismiss with prejudice a
19 discrimination lawsuit brought by the DOJ against
20 Musk's SpaceX in 2023 for its refusal to hire refugees

³⁶ Executive Order 14209 (Feb. 10, 2025),
<https://www.federalregister.gov/documents/2025/02/14/2025-02736/pausing-foreign-corrupt-practices-act-enforcement-to-further-american-economic-and-national-security>.

³⁷ See 15 U.S.C. § 78dd-1(a).

1 and people granted asylum in the United States, in
2 violation of federal law.³⁸

3 In all of this, Donald J. Trump has acted in a manner
4 contrary to his trust as President and subversive of
5 constitutional government, to the great prejudice of the cause
6 of law and justice and to the manifest injury of the people of
7 the United States.

8 Wherefore Donald J. Trump, by such conduct, warrants
9 impeachment and trial, and removal from office.

10
11 ARTICLE VIII

12 **Unlawfully imposing tariffs**

13
14 In his conduct of the office of President of the United
15 States, Donald J. Trump, in violation of his constitutional oath
16 faithfully to execute the office of President of the United States
17 and, to the best of his ability, preserve, protect, and defend the
18 Constitution of the United States, and in violation of his
19 constitutional duty to take care that the laws be faithfully
20 executed, has engaged in a corrupt course of conduct that

³⁸ See Unopposed Motion to Lift Preliminary Injunction for Limited Purpose, *Space Exploration Technologies Corp. v. Bell*, No. 1:23-cv-137 (S.D.Tex. Feb. 20, 2025) (seeking lift of administrative stay so that DOJ Civil Rights Division may file a notice of dismissal of the administrative proceeding with prejudice).

1 undermines the economic security of the United States, in
2 that:

3 Donald J. Trump has imposed a series of harmful tariffs
4 on country across the world with abrupt effective dates and
5 then has paused, modified, rescinded, re-imposed, increased, or
6 exempting goods from certain of these tariffs.³⁹ In imposing
7 these tariffs, Donald J. Trump has usurped powers explicitly
8 reserved to Congress pursuant to U.S. Const. art. I, § 8, abused
9 the president's limited power under the International
10 Emergency Economic Powers Act (IEEPA), and violated
11 multiple trade agreements. The tariffs have undermined the
12 United States economy, harmed the United States'
13 relationship with important trading partners, led to retaliatory
14 tariffs, had devastating effects on stock and bond markets,
15 crippled the economic security of Americans and American
16 businesses, and created significant risk of economic recession.

³⁹ See, e.g., Exec. Order 14,193 (Feb. 1, 2025) (imposing 25% tariff on most imports from Canada and 10% tariff on energy resources); Exec. Order 14,194 (Feb. 1, 2025) (imposing 25% tariff on imports from Mexico); Exec. Order 14,195 (imposing additional 10% tariff on most imports from China); Exec. Order 14,197 (pausing implementation of Canadian tariff for one month); Exec. Order 14,198 (pausing implementation of Mexican tariff for one month); Exec. Order 14,232 (Mar. 6, 2025) (exempting goods covered by the U.S.-Mexico-Canada Agreement); Exec. Order 14,228 (Mar. 3, 2025) (raising new tariffs on China to 20%); Exec. Order 14,245 (Mar. 24, 2025) (imposing 25% tariffs on goods imported from countries that import Venezuelan oil); Exec. Order 14,257 (Apr. 2 2025) (raising new tariffs on China to 34%, imposing 10% universal tariffs on all U.S. trading partners, and imposing tariffs of up to 50% on almost 90 countries); Exec. Order 14,259 (Apr. 8, 2025) (raising new tariffs on China to 84%); Exec. Order 14,266 (Apr. 9, 2025) (raising new tariffs on China to 125%; pausing all other tariffs imposed by Exec. Order 14,257 for 90 days).

1 Furthermore, Trump has used and is positioned to
2 continue using tariffs to corruptly benefit his and his allies'
3 financial interests and entrench his political power, including
4 by exempting certain industries from tariffs; imposing punitive
5 tariffs; and abruptly imposing, modifying, and pausing tariffs
6 in a manner that enables market manipulation by government
7 officials and allies who used their advanced knowledge of
8 executive orders to obtain improper financial gain.

9 In all of this, Donald J. Trump has acted in a manner
10 contrary to his trust as President and subversive of
11 constitutional government, to the great prejudice of the cause
12 of law and justice and to the manifest injury of the people of
13 the United States.

14 Wherefore Donald J. Trump, by such conduct, warrants
15 impeachment and trial, and removal from office.

17 ARTICLE IX

18 **Receiving foreign and domestic emoluments**

19
20 In his conduct of the office of President of the United
21 States, Donald J. Trump, in violation of his constitutional oath
22 faithfully to execute the office of President of the United States

1 and, to the best of his ability, preserve, protect, and defend the
2 Constitution of the United States, and in violation of his
3 constitutional duty to take care that the laws be faithfully
4 executed, has repeatedly misused his office for personal gain
5 by accepting presents or emoluments from foreign kings,
6 princes, and states without the consent of Congress, and by
7 receiving or appropriating for himself emoluments from the
8 United States and the several States in excess of the
9 compensation provided by law, in that:

10 While in office, he made it his policy to retain beneficial
11 ownership of, and has received substantial income from, the
12 Trump Organization, the Trump Media & Technology Group,
13 and his other diverse business interests. Since again taking
14 the oath of office on January 20, 2025, Donald J. Trump has
15 through these businesses solicited, accepted, or received
16 payments, contracts, permits, approvals, subsidies, and other
17 financial benefits from foreign governments, from the United
18 States, and from the several States.

19 This conduct has included one or more of the following:

- 20 1. He received and is scheduled to receive substantial
21 sums of money from expenditures by foreign
22 governments at or on his privately owned properties in

1 New York, New York; Miami, Florida; and Palm Beach,
2 Florida, including monthly fees collected from five
3 foreign governments (Saudi Arabia, India, Afghanistan,
4 Qatar, and Kuwait) that own units in Trump World
5 Tower; and fees paid to Trump by LIV Golf, created and
6 financed by the Saudi Arabian government, for use of
7 Trump property in Miami, Florida.⁴⁰

- 8 2. He received substantial valuable benefits for his
9 businesses in foreign countries, including trademarks,
10 government permits and approvals, and financial
11 support for building projects, from foreign
12 governments.
- 13 3. He received and is scheduled to receive substantial
14 sums of money from expenditures by foreign
15 governments, the United States, or the several states
16 via their purchase of shares in Trump Media &
17 Technology Group (TMTG), or via their purchase of
18 advertisements on the TMTG-owned Truth Social social
19 media platform. As of February 25, 2025, at least one

⁴⁰ Eric Lipton, *Trump Organization Issues Ethics Pledge for President-Elect's Second Term*, N.Y. Times (Jan. 10, 2025), <https://www.nytimes.com/2025/01/10/us/politics/trump-ethics-conflicts-of-interest.html>; *The Intensifying Threat of Donald Trump's Emoluments*, Citizens For Responsibility and Ethics in Washington, Aug. 28, 2024, <https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments/>.

1 bank controlled by a foreign government owns shares in
2 TMTG, as do several public pension plans operated by
3 state governments.⁴¹

4 4. He unlawfully receives compensation in the form of
5 federal and state expenditures at or on his privately
6 owned properties, including expenditures related to the
7 protection of Trump and his family by the Secret
8 Service and other government agencies.⁴²

9 5. He has enabled Elon Musk to unlawfully solicit, accept,
10 or receive payments, contracts, permits, approvals,
11 subsidies, and other financial benefits from foreign
12 governments, from the United States, and from the
13 several States via his position as special employee
14 responsible for DOGE, where he exercises authority
15 over the employment, actions, and data of agencies
16 with which his companies contract.

17 In all of this, Donald J. Trump has acted in a manner
18 contrary to his trust as President and subversive of
19 constitutional government, to the great prejudice of the cause

⁴¹ *Trump Media & Technology Group Corp. Common Stock (DJT) Institutional Holdings*, NASDAQ, https://www.nasdaq.com/market-activity/stocks/djt/institutional-holdings?page=1&rows_per_page=100 (as of Feb. 25, 2025).

⁴² Eric Lipton, *Trump Organization Issues Ethics Pledge for President-Elect's Second Term*, N.Y. Times (Jan. 10, 2025), <https://www.nytimes.com/2025/01/10/us/politics/trump-ethics-conflicts-of-interest.html>.

1 of law and justice and to the manifest injury of the people of
2 the United States.

3 Wherefore Donald J. Trump, by such conduct, warrants
4 impeachment and trial, and removal from office.

6 ARTICLE X

7 **Unconstitutionally usurping state authority.**

8
9 In his conduct of the office of President of the United
10 States, Donald J. Trump, in violation of his constitutional oath
11 faithfully to execute the office of President of the United States
12 and, to the best of his ability, preserve, protect, and defend the
13 Constitution of the United States, and in violation of his
14 constitutional duty to take care that the laws be faithfully
15 executed, has prevented, obstructed, and impeded the
16 administration of justice, in that:

17 Donald J. Trump, using the powers of his high office,
18 engaged personally and through his close subordinates and
19 agents, in a course of conduct or plan designed to violate the
20 power and authority vested in the states and the people by the
21 Tenth Amendment of the U.S. Constitution. The means used to
22 implement this course of conduct or plan included one or more

of the following:

1. Misusing the power and office of the Department of Justice to bring an unlawful lawsuit against the State of Illinois for electing not to spend its own finite resources to perform federal immigration functions.⁴³
2. Threatening criminal and civil sanctions against state and local governments that do not elect to use their own resources to perform federal immigration functions.⁴⁴
3. Threatening to withhold congressionally appropriated funds from state and local jurisdictions that do not elect to use their own resources to perform federal immigration functions;⁴⁵

In each instance, Trump has usurped or attempted to usurp the power afforded to states and local governments to determine how to utilize its own limited resources, including law enforcement, to serve the needs of their communities, and

⁴³ U.S. v. Illinois, Complaint, Case No. 25-cv-1285 (filed February 6, 2025).

⁴⁴ Executive Order 14159 (Jan. 20, 2025), <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>; U.S. DOJ Office of the Deputy Attorney General Memorandum, Interim Policy Changes Regarding Charging, Sentencing, and Immigration Enforcement (Jan. 21, 2025), https://www.washingtonpost.com/documents/2f9af176-72c5-458a-adc4-91327aa80d11.pdf?itid=hp-top-table-high_p001_f002.

⁴⁵ Executive Order 14159 (Jan. 20, 2025), <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>.

1 he has done so by misusing the Department of Justice to target
2 certain states for unlawful criminal and civil suits.

3 In all of this, Donald J. Trump has acted in a manner
4 contrary to his trust as President and subversive of
5 constitutional government, to the great prejudice of the cause
6 of law and justice and to the manifest injury of the people of
7 the United States.

8 Wherefore Donald J. Trump, by such conduct, warrants
9 impeachment and trial, and removal from office.

10
11 ARTICLE XI

12 **Improperly using emergency and wartime powers to**
13 **mobilize U.S. armed forces against migrants, evade**
14 **regulation of fossil fuel industry, deport immigrants,**
15 **and impose tariffs on U.S. trading partners**
16

17 In his conduct of the office of President of the United
18 States, Donald J. Trump, in violation of his constitutional oath
19 faithfully to execute the office of President of the United States
20 and, to the best of his ability, preserve, protect, and defend the
21 Constitution of the United States, and in violation of his
22 constitutional duty to take care that the laws be faithfully

1 executed, has engaged in a course of conduct that abuses the
2 power to declare national emergencies and undermines the
3 rule of law, in that:

- 4 1. He improperly declared immigration at the southern
5 border of the United States to be a “national
6 emergency” and asserted that migration constitutes an
7 “invasion,” so as to order the mobilization of armed
8 forces within the United States and at its borders.⁴⁶
9 Migration is not an invasion, the United States is not at
10 war, and as of January 14, 2025, unlawful migration
11 was at its lowest level since August 2020 and lower
12 than the monthly average for 2019.⁴⁷ To support his
13 misuse of the national emergency power and the U.S.
14 military, he made or caused to be made false or
15 misleading assertions in his Executive Order and in
16 public statements for the purpose of deceiving the
17 people of the United States into believing the existence
18 of an urgent national security threat.
19 2. He improperly declared a national energy emergency

⁴⁶ Executive Order 14167 (Jan. 20, 2025),
[https://www.federalregister.gov/documents/2025/01/30/2025-02089/clarifying-the-militarys-
role-in-protecting-the-territorial-integrity-of-the-united-states](https://www.federalregister.gov/documents/2025/01/30/2025-02089/clarifying-the-militarys-role-in-protecting-the-territorial-integrity-of-the-united-states).

⁴⁷ *CBP Releases December 2024 Monthly Update*, U.S. Customs and Border
Protection, Jan. 14, 2025, [https://www.cbp.gov/newsroom/national-media-release/cbp-
releases-december-2024-monthly-update](https://www.cbp.gov/newsroom/national-media-release/cbp-releases-december-2024-monthly-update).

pursuant to the National Emergencies Act, 50 U.S.C. § 1601 et seq. and 3 U.S.C. § 301,⁴⁸ when the United States is producing an historically high and reliable level of energy, in order to evade regulatory limits on fossil fuel development and to block the development of renewable energy sources. Under cover of the emergency, Trump is providing significant benefits to oil, gas, and coal companies in a manner that undermines the long-term stability of the U.S. energy grid and harms the American people.⁴⁹

3. He unlawfully invoked the Alien Enemies Act of 1798 in order to deport Venezuelans from the United States to El Salvador for immediate detention without adhering to U.S. laws governing the removal of noncitizens.⁵⁰ The Alien Enemies Act may only be invoked in limited circumstances, including declared

⁴⁸ Executive Order 14156 (Jan. 20, 2025), <https://www.federalregister.gov/documents/2025/01/29/2025-02003/declaring-a-national-energy-emergency>.

⁴⁹ See Joint Letter of Attorneys General to Chairman Mike Lee and Ranking Member Marin Heinrich of the U.S. Senate Committee on Energy and National Resources, Feb. 18, 2025 (urging the Committee to support S.J. Res. 10 to terminate the national energy emergency declared in Executive Order 14156).

⁵⁰ The White House, Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua, Mar. 15, 2025, <https://www.whitehouse.gov/presidential-actions/2025/03/invocation-of-the-alien-enemies-act-regarding-the-invasion-of-the-united-states-by-tren-de-aragua/>.

1 war, invasion, or predatory incursion by a foreign
2 government. 50 U.S.C. ch. 3 § 21. The Venezuelan
3 government has not declared war on the United States,
4 nor has it attempted to invade or incur on U.S.
5 territory, and Congress has not declared war on
6 Venezuela. In full knowledge that the terms for
7 invoking the Act have not been satisfied, Trump abused
8 his authority to unlawfully invoke the Act to deport
9 Venezuelans migrants to El Salvador, where they are
10 being held in prison without trial or hearing by either
11 government on the unproven assertion by Trump that
12 they are members of a criminal gang. At least some of
13 the imprisoned Venezuelans have credible claims for
14 asylum, have no prison records or affiliation with
15 gangs, and came to the United States to escape political
16 and economic oppression.⁵¹

17 4. He has unlawfully invoked the International
18 Emergency Economic Powers Act (IEEPA) to claim that
19 persistent trade deficits and the trafficking of drugs

⁵¹ J.G.G. v. Trump, Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order, Case No. 25-76 (Mar. 15, 2025); Silvia Foster-Frau, *For Four Venezuelan Friends, Alien Enemies Act Cuts Short An American Dream*, Wash. Post, Mar. 18, 2025, <https://www.washingtonpost.com/immigration/2025/03/18/trump-migrants-venezuelans-deportation-bukele/>.

1 and persons qualify as a national emergency that
2 empowers him to unilaterally impose tariffs on
3 countries across the world. The IEEPA does not
4 authorize the President to impose tariffs—a power
5 solely afforded to Congress by the U.S. Constitution—
6 even when an emergency exists. The power to impose
7 tariffs is not amongst the enumerated powers of the
8 President under the IEEPA, *see* 50 U.S.C. § 1702.
9 Moreover, the President also failed to abide by the
10 IEEPA requirement that the President “in every
11 possible instance . . . consult with Congress before
12 exercising any of the authorities granted by [the
13 IEEPA]” and “consult regularly with the Congress so
14 long as such authorities are exercised.” 50 U.S.C. §
15 1703(a). The myriad tariffs that he has unlawfully
16 imposed have crippled the U.S. economy, led to
17 escalating retaliatory tariffs from trading partners,
18 resulted in massive losses in the stock and bond
19 markets, and harmed the economic security of
20 American and Americans while enriching and
21 benefiting certain sectors, investors, and allies of the
22 President.

1
2 In all of this, Donald J. Trump has acted in a manner
3 contrary to his trust as President and subversive of
4 constitutional government, to the great prejudice of the cause
5 of law and justice and to the manifest injury of the people of
6 the United States.

7 Wherefore Donald J. Trump, by such conduct, warrants
8 impeachment and trial, and removal from office.
9

10 ARTICLE XII

11 **Abusing the pardon power through the broad pardon of**
12 **January 6 co-insurrectionists**
13

14 In his conduct of the office of President of the United
15 States, Donald J. Trump, in violation of his constitutional oath
16 faithfully to execute the office of President of the United States
17 and, to the best of his ability, preserve, protect, and defend the
18 Constitution of the United States, and in violation of his
19 constitutional duty to take care that the laws be faithfully
20 executed, has abused the pardon power and undermined due
21 process of law, in that:

- 22 1. He granted “full, complete and unconditional pardons”

1 to more than 1,500 co-insurrectionists who participated
2 in the assault on the Capitol on January 6, 2021 and
3 commuted the sentences of 14 additional
4 insurrectionists, all of whom participated in the
5 January 6, 2021 insurrection which Trump himself
6 incited. Pardons or sentence commutations were
7 granted to insurrectionists who breached the U.S.
8 Capitol, vandalized the Capitol and individual offices,
9 committed violence against law enforcement and
10 journalists, and orchestrated the violent insurrection,
11 including to insurrectionists found guilty of seditious
12 conspiracy.⁵² The pardons have been broadly applied to
13 other crimes committed by the insurrectionists,
14 including possession of grenades and other unlawful
15 weapons and a classified military document.⁵³

16 2. He directed the DOJ to dismiss all criminal cases
17 pending against defendants charged with crimes
18 stemming from the assault on the Capitol.

⁵² Carrie Johnson, *Trump Offers Long-Promised Pardons to Some 1,500 January Rioters*, NPR (Jan. 20, 2025), <https://www.npr.org/2025/01/20/g-s1-36809/trump-pardons-january-6-riot>; Alan Feuer, *Trump Grants Sweeping Clemency to All Jan. 6 Rioters*, NY Times (Jan. 20, 2025), <https://www.nytimes.com/2025/01/20/us/politics/trump-pardons-jan-6.html>.

⁵³ Kyle Cheney, *DOJ Says Trump's Jan. 6 Pardon Covers Man Convicted of Possessing Grenades, Classified Info*, Politico (Feb. 25, 2025).

1 3. He fired FBI agents and approximately twenty-four
2 DOJ prosecutors, all of whom were nonpartisan career
3 public servants, who investigated or prosecuted
4 criminal cases stemming from the January 6, 2021
5 attack on the Capitol.

6 For four years, impartial, nonpartisan investigators and
7 prosecutors carried out meticulous investigations in the events
8 of and surrounding January 6, compiling incontrovertible
9 evidence regarding the crimes committed that day and their
10 perpetrators. These crimes include the violent assault of 140
11 law enforcement officers with bear spray, axes, baseball bats,
12 and flag poles wielded as weapons. One law enforcement
13 official suffered two strokes and died after being sprayed with
14 pepper spray; another suffered a heart attack and traumatic
15 brain injury. More than 140 law enforcement officers were
16 injured while they protected Members of Congress, their staff,
17 the Vice President, and the Capitol itself from an
18 insurrectionist mob.

19 January 6-related criminal cases were presided over by
20 nonpartisan, impartial judges and, where defendants did not
21 plead guilty, given over to impartial juries of the defendants'
22 peers for final determination of the facts.

1 The issuance of blanket pardons, the dismissal of pending
2 January 6 cases, and the retributive termination of FBI and
3 DOJ employees for carrying out their duties has undermined
4 the independence of the FBI, the DOJ, and to the judiciary. It
5 has undermined efforts by multiple agencies to address and
6 prevent violent extremism. Moreover, by blocking the DOJ
7 from prosecuting ongoing cases and by blocking courts from
8 hearings these cases, Trump protects himself from facts and
9 allegations relating to his own role in the January 6
10 insurrection.

11 In all of this, Donald J. Trump has acted in a manner
12 contrary to his trust as President and subversive of
13 constitutional government, to the great prejudice of the cause
14 of law and justice and to the manifest injury of the people of
15 the United States.

16 Wherefore Donald J. Trump, by such conduct, warrants
17 impeachment and trial, and removal from office.

20 ARTICLE XIII

21 **Corruptly dismissing criminal charges against Eric**
22 **Adams and investigating DOJ officials based on**

retribution

In his conduct of the office of President of the United States, Donald J. Trump, in violation of his constitutional oath faithfully to execute the office of President of the United States and, to the best of his ability, preserve, protect, and defend the Constitution of the United States, and in violation of his constitutional duty to take care that the laws be faithfully executed, has prevented, obstructed, and impeded the administration of justice, in that:

1. He failed to take care that the laws were faithfully executed by entering into a corrupt quid pro quo agreement with New York City Mayor Eric Adams, in which the DOJ improperly dismissed a criminal indictment against Adams in return for his assistance in enforcing his federal immigration agenda.⁵⁴ When the U.S. Attorney charged with prosecuting the case resigned rather than file the motion to dismiss as she

⁵⁴ See Letter from Danielle Sassoon to Att’y Gen. Pamela Jo Bondi, Feb. 12, 2025, available at <https://www.cnn.com/2025/02/13/politics/read-acting-us-attorney-resignation-letter-doj-response/index.html>; William K. Rashbaum et al., *Push To Drop Adams Charges Reveals a Justice Dept. Under Trump’s Sway* (Feb. 10, 2025), <https://www.nytimes.com/2025/02/10/nyregion/eric-adams-charges-doj-trump.html>; Benjamin Weiser et al., *A Justice Dept. in Turmoil Moves to Dismiss Eric Adams’s Corruption Case*, NY Times (Feb. 14, 2025), <https://www.nytimes.com/2025/02/14/nyregion/eric-adams-drop-charges-sdny.html>.

1 was ordered to do, she explained that dismissal is not
2 in the public interest or “consistent with the principles
3 of impartiality and fairness,” and that dismissal “for no
4 other reason than to influence Adams’s mayoral
5 decision-making would be” an “abuse[] of the criminal
6 justice process, coercive behavior, [and] other forms of
7 misconduct.”⁵⁵

8 2. For purposes unrelated to any lawful function of his
9 office, he misused his official position to retaliate
10 against the U.S. attorney who resigned rather than file
11 a motion to dismiss Adams’ case and against other U.S.
12 attorneys assigned to the Adams prosecution. Through
13 Assistant Attorney General Emil Bove, he has ordered
14 these attorneys to be investigated by the Office of the
15 Attorney General and the Office of Professional
16 Responsibility and those attorneys who did not resign
17 have been placed on off-duty, administrative leave
18 pending investigation.⁵⁶

19 In all of this, Donald J. Trump has acted in a manner

⁵⁵ Letter from Danielle Sassoon to Att’y Gen. Pamela Jo Bondi, at 2, Feb. 12, 2025, available at <https://www.cnn.com/2025/02/13/politics/read-acting-us-attorney-resignation-letter-doj-response/index.html>.

⁵⁶ Letter from Emil Bove to Danielle Sassoon, Feb. 13, 2025, available at <https://www.nytimes.com/interactive/2025/02/13/nyregion/memo-from-bove-1.html>.

1 contrary to his trust as President and subversive of
2 constitutional government, to the great prejudice of the cause
3 of law and justice and to the manifest injury of the people of
4 the United States.

5 Wherefore Donald J. Trump, by such conduct, warrants
6 impeachment and trial, and removal from office.

8 ARTICLE XIV

9 **Depriving citizens of their birthright citizenship**

10
11 In his conduct of the office of President of the United
12 States, Donald J. Trump, in violation of his constitutional oath
13 faithfully to execute the office of President of the United States
14 and, to the best of his ability, preserve, protect, and defend the
15 Constitution of the United States, and in violation of his
16 constitutional duty to take care that the laws be faithfully
17 executed, has engaged in a course of conduct that violates and
18 undermines the citizenship by birthright guaranteed by the
19 Fourteenth Amendment to the Constitution, in that:

20 He has denied the privilege of United States citizenship to
21 persons born in the United States to certain Americans based
22 solely on the citizenship or visa status of their parents, in

1 violation of Section 1 of the Fourteenth Amendment. The
2 protection of citizenship extended to all individuals born in the
3 United States is enshrined in the U.S. Constitution and
4 unassailable, as are the rights of these citizens to all privileges
5 and immunities of citizens.

6 By attempting to deprive U.S. citizens of citizenship,
7 privileges, and immunities afforded to them by the U.S.
8 Constitution, Donald J. Trump has acted in a manner contrary
9 to his trust as President and subversive of constitutional
10 government, to the great prejudice of the cause of law and
11 justice and to the manifest injury of the people of the United
12 States.

13 Wherefore Donald J. Trump, by such conduct, warrants
14 impeachment and trial, and removal from office.
15
16
17
18

19 ARTICLE XV

20 **Impeding and obstructing efforts to secure United**
21 **States elections and protect against cyber attacks**
22

1 In his conduct of the office of President of the United
2 States, Donald J. Trump, in violation of his constitutional oath
3 faithfully to execute the office of President of the United States
4 and, to the best of his ability, preserve, protect, and defend the
5 Constitution of the United States, and in violation of his
6 constitutional duty to take care that the laws be faithfully
7 executed, has prevented, obstructed, and impeded the
8 administration of justice, in that:

9 Donald J. Trump, using the powers of his high office,
10 engaged personally and through his close subordinates and
11 agents, in a course of conduct or plan designed to impede and
12 obstruct efforts to secure U.S. elections. The means used to
13 implement this course of conduct or plan included one or more
14 of the following:

- 15 1. He has ordered the apolitical Cybersecurity and
16 Infrastructure Security Agency (CISA) to halt all its
17 election security work pending a review of its work
18 assisting state and local officials to secure their
19 elections and combat disinformation over the past eight
20 years; blocked funding for a group committed to
21 coordinating election security efforts in the elections
22 community; and fired 130 CISA cybersecurity

professionals,⁵⁷ thereby harming national security and undermining key coordination efforts between election officials across the country.⁵⁸

2. Through Attorney General Pam Bondi, he has disbanded the FBI task force assigned to investigate unlawful foreign influence in U.S. politics and elections, which investigated influence originating from Russia, China, Iran, and other foreign governments.⁵⁹
3. He has blocked CISA and the FBI from investigating and responding swiftly to interference in U.S. election systems or foreign government misinformation campaigns,⁶⁰ despite knowing about, benefiting from, or participating in actions that leave U.S. elections uniquely vulnerable to foreign and domestic threats.

⁵⁷ Eric Geller, *Top US Election Security Watchdog Forced to Stop Election Security Work*, Wired.com (Feb. 14, 2025), <https://www.wired.com/story/cisa-election-security-freeze-memo/>; see 6 U.S.C. § 652 (c), (e) (identifying responsibilities of the Cybersecurity and Infrastructure Security Agency).

⁵⁸ Pal Barker, *Firing of 130 CISA Staff Worries Cybersecurity Industry*, CSO (Feb. 21, 2025), <https://www.csoonline.com/article/3829710/firing-of-130-cisa-staff-worries-cybersecurity-industry.html>.

⁵⁹ Rebecca Beitsch, *DOJ Disbands Foreign Influence Task Force, Unit Tasked With Seizing Russian Oligarchs' Asset*, The Hill (Feb. 7, 2025), <https://thehill.com/policy/national-security/5132604-pam-bondi-doj-russia-oligarch-task-force/>; Fatima Hussein & Eric Tucker, *Trump's Justice Department Ends Biden-Era Task Force Aimed at Seizing Assets of Russian Oligarchs*, AP News (Feb. 6, 2025), <https://apnews.com/article/russia-sanctions-trump-treasury-doj-bondi-85ccedf25d5146db74d83dce01c9958c>.

⁶⁰ Ali Swenson & Christina A. Cassidy, *Dismantling of Federal Efforts to Monitor Election Interference Creates Opening For Foreign Meddling*, AP News (Feb. 16, 2025), <https://apnews.com/article/trump-election-security-fbi-cisa-foreign-interference-98f1e17c8a6d5923db945a27f06458e7>.

1 Namely:

2 a. Russian interference in the 2016 election was
3 “sweeping and systematic,” and foreign entities
4 carried out “information warfare” via social media
5 using misinformation campaigns that benefited
6 and in some cases coordinated with Trump’s own
7 campaign.⁶¹ Our nation’s intelligence agencies
8 concluded “with high confidence” that Russia
9 carried out a “multifaceted” assault on the 2016
10 election, featuring “disclosure of data obtained
11 through Russian cyber operations; intrusions into
12 US state and local electoral boards; and over
13 propaganda,” which was aimed at “undermining
14 public faith in the US democratic process.”⁶²
15 Russia, Iran, and China continue to attempt to
16 influence US elections to interfere in US elections
17 have continued, via hacking—including efforts by
18 Iranian-linked hackers to target individuals tied to

⁶¹ Special counsel Robert S. Mueller, III, *Report on the Investigation Into Russian Interference in the 2016 Presidential Election*, U.S. Department of Justice, vol. 1 (March 2019); https://www.justice.gov/storage/report_volume1.pdf; Special counsel Robert S. Mueller, III, *Report on the Investigation Into Russian Interference in the 2016 Presidential Election*, U.S. Department of Justice, vol. 2 (March 2019), https://www.justice.gov/storage/report_volume2.pdf.

⁶² *Russia’s Influence Campaign Targeting the 2016 US Presidential Election*, Office of the Director of National Intelligence, ICA 2017-O1D (Jan. 6, 2017).

1 all three major 2024 candidates: Trump, Biden,
2 and Harris—and utilizing artificial intelligence
3 and social media to spread foreign government
4 propaganda and disinformation, including by
5 placing blame for the Russian invasion of Ukraine
6 on Ukraine.⁶³

7 b. Election officials and operatives in eight U.S.
8 locales across the country associated with efforts
9 to overturn the results of the 2020 election, some
10 of whom have close ties with Trump, have
11 unlawfully breached voting systems and obtain
12 copies of voting machine software and other
13 sensitive data. The software and data have been
14 shared with a wide network of other parties, any of
15 whom might use their illegitimate access to
16 develop ways to exploit the software, thereby

⁶³ See *United States v. Kalashnikov*, Sealed Indictment, Case No. 24-cr-519 (S.D.N.Y. Sep. 4, 2024), *available at* <https://www.justice.gov/archives/opa/media/1366266/dl>; Shannon Bond, *Meta Takes Down More Accounts Tied to Iranian Hackers Targeting the U.S. Elections*, NPR (Aug. 23, 2024), <https://www.npr.org/2024/08/23/g-s1-19350/meta-iran-hacking-election-trump-harris-biden>; Ellen Nakashima, *Russia's Election Influence Efforts Show Sophistication, Officials Say*, Wash. Post (Sep. 7, 2024), <https://www.washingtonpost.com/national-security/2024/09/07/russia-election-covert-disinformation-doj/>; David Nakamura et al., *Justice Dept. Charges Two Russian Media Operatives in Alleged Scheme*, Wash. Post (Sep. 4, 2024), <https://www.washingtonpost.com/national-security/2024/09/04/justice-department-election-security/>.

1 undermining the security of our election systems.⁶⁴

2 These systems are still being used in these and
3 other counties and states.

4 As President of a country facing an unprecedented threat
5 of foreign and domestic interference in U.S. elections and in
6 receipt of incontrovertible proof that foreign and domestic
7 entities have the resources, tools, and capacity to hack our
8 election systems and the email systems of high-level officials,
9 and to spread disinformation and propaganda via social media
10 platforms, Trump has terminated cybersecurity experts and
11 ceased the functioning of an agency committed to protecting
12 our country's cybersecurity and U.S. elections from cyber-
13 attacks; and has undermined the capacity and independence of
14 the FBI and DOJ to investigate and prosecute cybersecurity
15 attacks and other incursions by foreign entities into U.S.
16 elections.

17 In all of this, Donald J. Trump has acted in a manner
18 contrary to his trust as President and subversive of
19 constitutional government, to the great prejudice of the cause

⁶⁴ Alexandra Ulmer & Nathan Layne, *Trump Allies Breach U.S. Voting Systems in Search of 2020 Fraud 'Evidence,'* Reuters (Apr. 28, 2022), <https://www.reuters.com/investigates/special-report/usa-election-breaches/>; Kate Brumback, *Video Fills in Details on Alleged Ga. Election System Breach*, AP News (Sep. 6, 2022), <https://apnews.com/article/2022-midterm-elections-technology-donald-trump-voting-92c0ace71d7bee6151dd33938688371e>.

1 of law and justice and to the manifest injury of the people of
2 the United States.

3 Wherefore Donald J. Trump, by such conduct, warrants
4 impeachment and trial, and removal from office.

5
6 ARTICLE XVI

7 **Planning the forced removal of Palestinians**
8 **from Gaza**
9

10 In his conduct of the office of President of the United
11 States, Donald J. Trump, in violation of his constitutional oath
12 faithfully to execute the office of President of the United States
13 and, to the best of his ability, preserve, protect, and defend the
14 Constitution of the United States, and in violation of his
15 constitutional duty to take care that the laws be faithfully
16 executed, has repeatedly misused his official position to
17 threaten and promote the forced removal of Palestinians from
18 Palestine and the commission of crimes against humanity and
19 war crimes against Palestinian civilians.

20 Donald J. Trump has repeatedly declared his intention to
21 unlawfully and forcibly displace Palestinians from Gaza and
22 for the United States to unlawfully occupy the land and

1 financially profit from its development. In addition to public
2 statements via social media and the press, he has pressed this
3 policy in official engagement with heads of state in the Middle
4 East, namely by announcing his plan during a meeting and
5 press conference with Israeli Prime Minister Benjamin
6 Netanyahu, and by pushing King Abdullah II of Jordan to
7 commit to taking in forcibly displaced Palestinians.

8 These statements include:

- 9 • Telling reporters on January 26 on Air Force One
10 that Palestinians should be moved to other countries
11 to “just clean out” their homelands.
- 12 • Stating on February 4, 2025 that “I don’t think
13 people should be going back to Gaza. I heard that
14 Gaza has been very unlucky for them. They live like
15 hell. They live like they’re living in hell. Gaza is not
16 a place for people to be living.”
- 17 • In a joint press conference with Israeli Prime
18 Minister Benjamin Netanyahu on February 4, 2025,
19 stating that “the US will take over the Gaza Strip
20 and will do a job with it too,” that the US will “own
21 it” and did not rule out the US of military troops,
22 instead stating that “As far as Gaza is concerned,

1 we'll do what is necessary. If it's necessary, we'll do
2 that. We're going to take over that piece and we're
3 going to develop it."

- 4 • On February 4, also describing Palestine as a new
5 "Riviera."
- 6 • Posting to his Truth Social site on February 6 that
7 "The Gaza Strip would be turned over to the United
8 States by Israel at the conclusion of fighting. . . . The
9 U.S., working with great development teams from
10 all over the World, would slowly and carefully begin
11 the construction of what would become one of the
12 greatest and most spectacular developments of its
13 kind on Earth."
- 14 • Telling reporters on February 9, 2025, that: "It's a
15 big mistake to allow people—the Palestinians, or the
16 people living in Gaza—to go back yet another time,
17 and we don't want Hamas going back. And think of
18 it as a big real estate site, and the United States is
19 going to own it and we'll slowly—very slowly, we're
20 in no rush—develop it."
- 21 • In an interview with Fox News Channel that aired
22 on February 10, 2025, denying that Palestinians

1 would have the right to return to Gaza after he
2 removes them, specifically when asked whether
3 Palestinians would have the right to return to Gaza,
4 answering: “No, they wouldn’t because they’re going
5 to have much better housing. . . . I’m talking about
6 building a permanent place for them.”

- 7 • In a meeting with King Abdullah II of Jordan on
8 February 11, 2025, Donald J. Trump stated that
9 after talks with Middle Eastern countries that he
10 intends to “have a parcel of land in Jordan, a parcel
11 of land in Egypt, we may have some place else . . .
12 where they’ll live very happily.”

13 Donald J. Trump is threatening to commit or order the
14 commission of war crimes under international treaties to
15 which the United States is a party and under U.S. law.

16 Article 49 of the Geneva Convention Relative to the
17 Protection of Civilian Persons in Time of War (the Fourth
18 Geneva Convention) prohibits “[i]ndividual or mass forcible
19 transfers, as well as deportations of protected persons from
20 occupied territory to the territory of the Occupying Power or to
21 that of any other country, occupied or not . . . regardless of
22 their motive.” The unlawful deportation, transfer, or unlawful

1 confinement of protected persons is a “grave breach,” under the
2 terms of the Fourth Geneva Convention, art. 147, and
3 therefore qualifies as a felony offense under the U.S. War
4 Crimes statute, 18 U.S.C. § 2441.

5 While endorsing the forcible deportation of Palestine from
6 Gaza, Trump also has imposed baseless sanctions against
7 International Criminal Court Chief Prosecutor Karim Kahn
8 and threatened to impose additional sanctions against ICC
9 personnel. The order undermines the ICC’s ability to
10 investigate and prosecution of war crimes around the world
11 and serves no purpose but to protect himself and his complicit
12 allies from the consequences of committing war crimes and
13 crimes against humanity in Palestine.

14 Wherefore Donald J. Trump, by such conduct, warrants
15 impeachment and trial, and removal from office.