



**THE ABUSE OF PRESIDENTIAL POWER  
AND BREACH OF PUBLIC TRUST**

**RULE OF LAW TASK FORCE**

**DECEMBER 2025**

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## EXECUTIVE SUMMARY

This Report examines a broad pattern of conduct by President Donald J. Trump and his Administration that, in our judgment, reflects an ongoing abuse of presidential power and a grave breach of the public trust.<sup>1</sup> The Presidential Oath set forth in the Constitution requires the President, before taking office, to pledge to “preserve, protect and defend the Constitution of the United States.” Article II, Section 3 of the Constitution further requires the President to “take care that the Laws be faithfully executed.” Beyond these two Constitutional injunctions, our democratic system of government is based on the premise that our President will use his delegated powers for the benefit of our republic and will not abuse those powers for personal gain, to undermine our democratic system of governance or to suppress individual rights protected by our Constitution.

Drawing on publicly reported facts, court filings, and the Administration’s own statements and actions, the New York City Bar Association (City Bar), through its Rule of Law Task Force,<sup>2</sup> concludes that the President and his staff have repeatedly used the powers of the Executive Office not to “preserve, protect and defend the Constitution,”<sup>3</sup> nor to “take care that the Laws be faithfully executed,”<sup>4</sup> but instead to advance personal interests, to suppress Constitutional rights, and to weaken the laws and institutions that sustain our constitutional democracy. The number, scope, and nature of these abuses reach virtually every core responsibility of the presidency—from commanding the armed forces and enforcing the laws to safeguarding the health, safety, and welfare of the American people.

The conduct we analyze falls into six principal categories.

*First*, the President has abused his role as Commander-in-Chief by deploying federal troops and federalized National Guard forces into American cities without lawful justification, over the objections of state and local officials, and in defiance of judicial rulings—using military

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<sup>1</sup> This report is intended to provide a summary of actions and initiatives undertaken by the President and his Administration as of the date of finalization. The information contained herein is based on materials available at the time of compilation and does not purport to reflect subsequent developments. Certain actions described may be ongoing, subject to modification, or otherwise evolving.

<sup>2</sup> The Task Force on the Rule of Law is comprised of members of diverse professional backgrounds in government, civil and criminal private practice, academia, non-governmental organizations and the judiciary, having a wealth of experience in promoting the rule of law domestically and internationally. The Task Force focuses on the framework for decision-making in a constitutional democracy that encompasses, among other things, due process of law, adherence to separation of powers and a system of checks and balances, the protection of fundamental rights, and the fair and equal administration of justice by an independent judiciary.

<sup>3</sup> U.S. Const. art. II, § 1, cl. 8.

<sup>4</sup> U.S. Const. art. II, § 3.

power as a domestic policing tool to intimidate political opponents and chill constitutionally protected protest.

*Second*, the President and his Administration have repeatedly undermined fundamental rights guaranteed by the Constitution and federal law, including efforts to strip citizenship from a class of U.S.-born citizens, restrict voting and distort electoral representation, suppress protected speech and academic freedom, and sanction sweeping, rights-violating immigration enforcement and detention practices at home and abroad.

*Third*, the President and his Administration have systematically attacked judicial independence—personally vilifying judges, threatening noncompliance with adverse orders, failing to comply with court rulings, and attempting to intimidate private law firms and individual lawyers who represent clients in opposition to the President and his Administration — actions that erode the rule of law and public confidence in the courts.

*Fourth*, the President and his Administration have sought to undermine Congress’s constitutional role and to dismantle or disable Congressionally mandated agencies and programs in ways that exceed the Executive Branch’s lawful authority. These actions include initiating hostilities and military strikes abroad without Congressional authorization; delegating sweeping power over the federal workforce and critical social programs to an unelected, private “Department of Government Efficiency;” jeopardizing Social Security benefits; weakening public health and education systems; rolling back essential environmental and disaster protections; and stripping independent agencies and Inspectors General of their ability to provide effective oversight.

*Fifth*, the President and his Administration have compromised national security by engaging in uses of force that contravene U.S. treaty obligations, condoning serious lapses in defense and intelligence practices, abandoning or undermining key international institutions and programs, and implementing immigration and travel bans widely perceived as grounded in racial and religious animus, thereby eroding our global standing and the rules-based order the United States helped build.

*Sixth*, and finally, the President is using the Presidency for personal enrichment on a scale without modern precedent—leveraging regulatory and foreign policy decisions, pardon power, access to the White House, and federal branding and prestige to benefit his own businesses and those of his immediate family and close associates, all in ways that conflict not only with the spirit but also likely the letter of the Constitution’s Emoluments Clauses and basic anti-corruption norms.

Viewed in isolation, some individual actions might be defended as exercises of lawful presidential discretion or as policy choices subject to correction at the ballot box. But taken together, they amount to a fundamental erosion of democratic values, the rights enshrined in the Constitution, and the basic health, safety, and welfare protections that Americans rightly expect from their government.

The Constitution provides multiple mechanisms for holding a President accountable for misconduct. These include vigorous Congressional oversight and public hearings; formal

censure; the appointment of special counsel or other independent investigative mechanisms; and the use of Congress’s appropriations and legislative powers to constrain or reverse unlawful or abusive policies.<sup>5</sup> Congress can also demand that vacant Inspector General positions be filled, and call for investigations into the vacancies and other concerns as appropriate.<sup>6</sup> All of these tools are available to Congress to curb Presidential and Executive Branch overreach and abuses.

The most potent option available to Congress is impeachment, either of the President or senior officials guilty of misconduct. The Constitution provides that the President, as well as other officers of the United States, may be impeached and, if convicted, shall be removed from office for “Treason, Bribery or other high Crimes and Misdemeanors.” The Constitution’s impeachment standard does not rely on the technical commission of a crime or on any single episode of misconduct. Rather, it encompasses “Treason, Bribery, or other high Crimes and Misdemeanors,”<sup>7</sup> a phrase long understood to include, and require, grave abuses of official power and profound betrayals of the public trust.<sup>8</sup> And where, as here, much of the conduct occurs within the core of the President’s formal authority, impeachment may be the primary constitutional mechanism for accountability, because ordinary civil and criminal liability is unavailable while the President remains in office or thereafter.

This Report does not purport to dictate outcomes. It is for Congress, exercising its constitutional role, and for the American people, exercising their democratic right to vote, to determine whether the conduct described herein warrants Congressional oversight, investigation, legislative response, impeachment and removal, or other action. Our purpose is to assemble, analyze, and present the relevant facts and legal standards. While cognizant of the possible reluctance to set the impeachment mechanism in motion, the Report explains how the conduct described herein fits within the established framework for “high Crimes and Misdemeanors.” In addition, there are other actions that Congress can and should take to effectuate its longstanding oversight function with respect to government agencies and in its role representing and safeguarding the rights and interests of the American people.

By presenting the breadth, persistence, and escalating nature of the current Administration’s abuses and overreach in one document, we hope to highlight their many damaging effects and warn government officials, the legal profession, and the broader public about the imminent – and, indeed, already present – danger to our constitutional democracy and the framework that protects our individual rights and freedoms. We will continue to monitor events as they unfold. We must not lose sight of all our nation has to lose by abdicating the roles and responsibilities of our tripartite government – with its separation of powers and its checks

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<sup>5</sup> The Twenty-Fifth Amendment also provides a process, initiated by the Vice President or cabinet officers, to address Presidential disability. Since that process relates to presidential capacity, rather than abuse of office, we do not address it in detail here.

<sup>6</sup> It should go without saying that Members of Congress can also, as some have, write open letters to the President and Executive Branch officials to raise public awareness and to foster support for combatting Executive Branch misconduct and overreach.

<sup>7</sup> U.S. Const. art. II, § 4.

<sup>8</sup> Cass R. Sunstein, *Impeachment: A Citizen’s Guide* (2017), available at <https://lccn.loc.gov/2017034532>; Akhil Reed Amar, *On Impeaching Presidents*, 28 Hofstra L. Rev. 291, 291–341 (1999), available at <https://scholarlycommons.law.hofstra.edu/hlr/vol28/iss2/1>. (All websites last accessed Dec. 2025)

and balances – which was carefully designed to prevent despotism and rule by fear and fiat. We call on Congress to reclaim its power as a co-equal branch of government to use all available tools of accountability to address the ongoing threats to our constitutional democracy, the rule of law, the safety and rights of those subject to federal power, and the preservation of our constitutional system.

## EGREGIOUS CONDUCT AND ABUSE OF POWER

The conduct of President Trump and his Administration that we believe constitutes an egregious abuse of power and a grave betrayal of public trust falls into six major categories:

- I. Deploying our Nation’s Armed Forces Unlawfully Against the People;
- II. Undermining the People’s Constitutional Rights;
- III. Undermining Judicial Independence;
- IV. Undermining Congress and its Federal Programs;
- V. Compromising National Security; and
- VI. Corrupting the Presidency to Enrich the President and His Family.

The broad pattern of abuse in each of these categories is summarized below. Many of these abuses have relied on Presidential declarations of national “emergencies” that have no plausible basis and are intended to permit the President to circumvent legal or Constitutional constraints on his authority and to deploy the full power of the federal government against those who resist his demands whether they are individuals, non-profit organizations, corporations or federal, state or municipal officials. Ominously, the President has even begun employing our nation’s armed forces in our own cities on the pretext of reducing crime or suppressing “rebellion,” but amounting instead to a clear and present danger to the democratic institutions he is pledged to defend.

### I. DEPLOYING ARMED FORCES IN U.S. CITIES

**The President, with support from members of his Administration, has abused his role as commander-in-chief of our nation’s armed forces by deploying, without cause and contrary to law, national guard and active-duty troops to patrol American cities in order to punish state and municipal officials who defy his will and to intimidate citizens and visitors in the exercise of their Constitutional rights to free speech, to assemble peacefully and, in the case of citizens, to petition their government for redress of grievances. These actions, taken in violation of the Posse Comitatus Act of 1878<sup>9</sup> under the pretext of suppressing**

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<sup>9</sup> 18 U.S.C. § 1385 (penalizing anyone who, “except in cases and under circumstances expressly authorized by the Constitution or Act of Congress, willfully uses any part of the Army, the Navy, the Marine Corps, the Air Force, or the Space Force as a posse comitatus”). *See also* Joseph Nunn, *The Posse Comitatus Act Explained*, BRENNAN CENTER FOR JUSTICE (Oct. 14, 2021), <https://www.brennancenter.org/our-work/research-reports/posse-comitatus-act-explained> (defining the term “posse comitatus” as a group assembled by a sheriff to combat lawlessness and

**non-existent “rebellions” under a 1903 federal law<sup>10</sup> or under the Insurrection Act of 1807<sup>11</sup>, include:**

**A. Deploying National Guard and Marine Troops to Los Angeles**

In June 2025, over the objections of both the Mayor of Los Angeles and the Governor of California, the President “federalized” California Guard troops and deployed approximately 4,000 of them, together with some 700 active-duty marines, to patrol portions of that city that the President claimed, contrary to evidence, were not being adequately patrolled or safeguarded by municipal police.<sup>12</sup> Approximately 100 heavily armed National Guard and Marine troops, together with their vehicles and horses, remained on “patrol” in Los Angeles as of December 10, 2025 over the continuing objections of the Mayor and the Governor of California<sup>13</sup> and despite a September 2, 2025 ruling by the U.S. District Court in San Francisco that there is no legal basis for those patrols, and that their deployment violated the Posse Comitatus Act. Although the September 2 decision was stayed by a federal appellate court, the District Court issued a further ruling on December 10, 2025, upheld by the appellate court on December 13, 2025, barring continued national guard patrols under that Act.<sup>14</sup> Even if ultimately permitted on further judicial review, the President’s deployment of the military for local law enforcement in the absence of a demonstrated need or request by the Governor is an abuse of his authority under laws clearly intended for very different conditions.

**B. Deploying National Guard and Active Duty Troops to Washington, D.C.**

In August 2025, the President, acting under the authority of the District of Columbia Home Rule Act, directed National Guard troops from adjacent states to assume police functions in Washington, D.C., purportedly in order to reduce crime in a city that had already seen a significant reduction in its crime rate. Although initially unarmed, these federalized troops were later armed and directed to assist local police in municipal police functions. As of this writing, they remain on duty visibly patrolling peaceful tourist sites in the nation’s capital while instilling increased fear of arbitrary federal arrest among many city residents, particularly after U.S.

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emphasizing the Posse Comitatus Act’s purpose of prohibiting the use of the military for civilian law enforcement unless expressly authorized by Congress or the Constitution).

<sup>10</sup> 10 U.S.C. § 12406.

<sup>11</sup> 10 U.S.C. §§ 251–55.

<sup>12</sup> Juliana Kim, *Where Each of Trump’s National Guard Deployments and Related Court Battles Stand*, NPR (Oct. 10, 2025), <https://www.npr.org/2025/10/10/nx-s1-5567177/national-guard-map-chicago-california-oregon>.

<sup>13</sup> See Press Release, Office of Governor Gavin Newsom, *Nearly All National Guard Soldiers in Los Angeles are Demobilizing, Governor Newsom Demands Those Remaining Be Released* (July 31, 2025), <https://www.gov.ca.gov/2025/07/31/nearly-all-national-guard-soldiers-in-los-angeles-are-demobilizing-governor-newsom-demands-those-remaining-be-released/>) (noting that 300 National Guard members remained deployed in California “nearly two months after the unlawful federalization of [their] units” and calling for the President to demobilize the remaining soldiers).

<sup>14</sup> See *Newsom v. Trump*, U.S.D.C. (Northern District of California) (case 25-cv-04870 CRB), Dec. 10, 2025; Shawn Hubler, *Appeals Court says Trump must end Los Angeles deployment by Monday*, NY Times, Dec. 10, 2025, <https://www.nytimes.com/2025/12/13/us/california-national-guard-trump-los-angeles.html>.

Attorney Jeanine Pirro announced that she would seek maximum criminal charges against all persons arrested in the city.<sup>15</sup>

### C. Deploying National Guard and Active Duty Troops Nationally

The President's use of highly visible armed forces in the nation's capital was intended, according to the President, to send a warning to mayors and governors in Portland, Chicago, New York, Memphis and other major cities that he planned to order similar troop deployments in those communities, whether or not requested by local officials. Unlike the deployment in Washington, D.C., use of National Guard and active-duty troops in those jurisdictions is limited by the Posse Comitatus Act and the Insurrection Act, which together prohibit that deployment absent an insurrection or rebellion or a request for assistance by the governor. Despite those prohibitions, the President acted on his threats by ordering federalized national guard troops to Portland, Chicago and Memphis in October, again over the objections of the governors of Oregon and Illinois, and the mayor and other public officials in Memphis, that there was neither need nor justification for any such federal deployment. The President's simultaneous use of federal troops in four different states – unprecedented in our nation's history since the Civil War – sends an ominous message to the public that he feels unconstrained either by law or by the expectations of the American people that their armed forces are intended to protect the nation against foreign aggressors, not against the people themselves.

This threat was made explicit by the President in his speech to the nation's military leaders at Quantico Naval Base in which he urged the armed forces to use U.S. cities as military "training grounds"<sup>16</sup> and his directive for the military to use "full force" to protect "war ravaged Portland from siege by Antifa and other domestic terrorists."<sup>17</sup> When the U.S. District Court in Portland ruled in early October that the President had no lawful basis to deploy Oregon's national guard to patrol Portland, the President responded by ordering the California national guard to Portland over the objections of the Governors of both Oregon and California.<sup>18</sup>

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<sup>15</sup> Devlin Barrett, *Pirro Orders Office to Maximize Criminal Charges on Street Arrests*, N.Y. Times (Aug. 19, 2025), <https://www.nytimes.com/2025/08/19/us/politics/pirro-dc-crime-charges-arrests.html?smid=url-share>; Kim, *supra* note 12.

<sup>16</sup> Bernd Debusmann Jr. & James FitzGerald, *US Cities Should Be Military Training Grounds, Trump Tells Generals*, BBC NEWS (Sept. 30, 2025), <https://www.bbc.com/news/articles/cvgq044n72po>.

<sup>17</sup> Claire Rush & Chris Megerian, *Trump Says He's Sending Troops to Portland in Latest Deployment to U.S. Cities*, PBS (Sept. 27, 2025), <https://www.pbs.org/newshour/politics/trump-says-hes-sending-troops-to-portland-in-latest-deployment-to-u-s-cities>.

<sup>18</sup> Eric Schmitt, *Pentagon to Withdraw Some National Guard Troops From Chicago and Portland*, N.Y. TIMES (Nov. 16, 2025), <https://www.nytimes.com/2025/11/16/us/politics/national-guard-withdrawal-chicago-portland.html> (describing the deployment of hundreds of National Guard soldiers to Chicago and Portland over the "strenuous objections of state and local leaders" and noting that hundreds of troops will remain activated in both cities, even if some soldiers are withdrawn).

## II. UNDERMINING CONSTITUTIONAL RIGHTS

The President, with support from others in his Administration, has sought to undermine the individual rights protected in our Constitution and laws by attempting to revoke the citizenship of a class of citizens born in the United States, to limit the ability of citizens to vote, by suppressing freedom of speech and thought by citizens, visitors and institutions and by encouraging widespread abusive practices by federal agents both at home and abroad. These unlawful and abusive actions by the President and his agents include:

### A. Attempting to Revoke Citizenship

Among the President's first acts following his inauguration in January 2025 was his attempt to deprive one group of citizens born in the United States (generally those whose parents were not citizens or Green Card holders) of their citizenship in order to expel those citizens from the country, limit their right to vote and prevent them from exercising the rights and enjoying the benefits of citizenship of the United States, all in violation of the 14<sup>th</sup> Amendment of the Constitution. Although this attempt to deprive U.S.-born citizens of their status under the Constitution has been rejected by the federal courts, including the Supreme Court, the President and his agents have continued efforts to deport those citizens illegally or to encourage them to "voluntarily" leave the country by deporting parents who are reluctant to leave their minor children alone in a country whose government has shown continuing hostility to their presence.<sup>19</sup>

### B. Undermining Voting Rights and the Election Process

In March 2025, the President issued an Executive Order purporting to require documentary proof of citizenship for voter registration. A recent court ruling, holding for a second time that this Executive Order exceeded the President's authority, emphasized that the President cannot unilaterally dictate changes to federal election procedures, and doing so violates the separation of powers enshrined in the Constitution.<sup>20</sup> Nevertheless, the President has since announced his intention to issue an Executive Order banning voting by mail in all federal elections.<sup>21</sup> By law, the President has no authority over federal elections, which, under the

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<sup>19</sup> Ogletree Deakins, *Supreme Court To Review Constitutionality of Birthright Citizenship in 2025-26*, <https://ogletree.com/insights-resources/blog-posts/supreme-court-to-review-constitutionality-of-birthright-citizenship-in-2025-26-term/>.

<sup>20</sup> *League of United Latin Am. Citizens v. Exec. Off. of the President*, No. 25-0946 (D.D.C. Oct. 31, 2025), at 2, 66, available at <https://law.justia.com/cases/federal/district-courts/district-of-columbia/dcdce/1:2025cv00946/279032/218/> (“[O]ur Constitution assigns responsibility for election regulation to the States and to Congress . . . [T]he President lacks authority to direct such changes.”); *League of United Latin Am. Citizens v. Exec. Off. of the President*, No. 25-0946 (D.D.C. Apr. 24, 2025), at 112 & 114, available at <https://law.justia.com/cases/federal/district-courts/district-of-columbia/dcdce/1:2025cv00946/279032/104/> (granting plaintiffs’ preliminary injunction with respect to the Executive Order provisions requiring proof of citizenship for voter registration, noting that those provisions “cannot lawfully be implemented”).

<sup>21</sup> Tyler Pager & Nick Corasaniti, *Trump Wants to End Mail-In Voting Ahead of Next Year’s Midterms*, N.Y. TIMES (Aug. 18, 2025), <https://www.nytimes.com/live/2025/08/18/us/trump-news#trump-mail-ballots-voting-machines-election> (noting that “the president does not have the power to unilaterally change voting laws, and any executive order regarding elections is likely to see immediate legal challenges”).

Constitution, are conducted by each state in accordance with its own laws, subject to the requirements of the Voting Rights Act of 1965 and Congress's right to override state rules relating to the time, place and manner of voting for federal offices. Beyond its illegality, the President's proposed Executive Order represents an effort to discourage American citizens from exercising their most fundamental power in our democracy: that of choosing our leaders. Mail-in voting is now widely practiced in virtually all states, and the President's attempt to expand his own authority over the exercise of that right is inconsistent with the role of his office. Furthermore, the President has greatly weakened the states' ability to conduct secure elections by drastically reducing resources that had been made available to the states for election security. The Cybersecurity and Infrastructure Security Agency has scaled back staff focused on supporting state and local election offices, and the appropriation to the Election Assistance Administration for election security grants was cut by 73%.<sup>22</sup>

Taken together, these actions are antithetical to the goals and promises of the Voting Rights Act of 1965 and to the foundational precepts of our democratic process. Instead, they appear aimed at reducing the ability of the American people to exercise their right to vote and to hold their leadership accountable through the process of elections.<sup>23</sup>

### **C. Suppressing Freedom of Speech and Thought**

#### **1. Attempting to Silence the Press and Critics**

The President has sought to silence and suppress lawful criticism by personally threatening, ordering or commencing the investigation and prosecution of private citizens, journalists and media firms who disagree with or criticize his personal or Presidential actions or who supported his opponent in either the 2020 or 2024 Presidential elections.<sup>24</sup> In violation of

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<sup>22</sup> Brenna Nelson, *As Federal Support for Elections Evolves, States Adapt to Close Emerging Gaps*, NAT'L CONF. OF ST. LEGISLATURES (July 31, 2025), <https://www.ncsl.org/state-legislatures-news/details/as-federal-support-for-elections-evolves-states-adapt-to-close-emerging-gaps>. See also Maggie Miller, *The Trump Admin Cut Election Security Funds. Now Officials Fear Future Elections May Be 'Less Secure'*, POLITICO (Mar. 31, 2025), <https://www.politico.com/news/2025/03/31/trump-admin-cut-election-security-funds-00258787>; Jule Pattison-Gordon, *The Feds Cut Funding for Election Cybersecurity. How Will Public Officials Adapt?*, GOVERNING (Dec. 2, 2025), <https://www.governing.com/management-and-administration/the-feds-cut-funding-for-election-cybersecurity-how-will-public-officials-adapt>.

<sup>23</sup> The President has also called on the State of Texas and other states to gerrymander their Congressional maps (that is, redistrict their Congressional voting districts for the explicit purpose of increasing his party's share of those states' representatives in Congress) and, where necessary, to conduct special census counts for that purpose rather than using the normal decennial census. Joey Cappelletti & Nicholas Riccardi, *Trump Tells Texas Republicans to Redraw the State Congressional Map to Help Keep House Majority*, AP NEWS (July 15, 2025), <https://apnews.com/article/trump-congress-house-republicans-texas-redistricting-d18e8280a32872d9eefcbb26f66a0331>. While gerrymandering has been ruled permissible in some instances by the courts, this action follows the President's pattern of undermining the procedural norms of the electoral process and attempting to pressure state officials into doing the same in order to benefit him politically, rather than protecting their constituents' right to engage in the political process. Like the President's Executive Orders on voting rights, this abuse too is intended to undermine the free and fair elections that give American voters the chance to select their Congressional representatives and, through them, to hold the President accountable for his own actions.

<sup>24</sup> Justin Spike & Nicholas Riccardi, *Trump's Moves Against Media Outlets Mirror Authoritarian Approaches to Silencing Dissent*, PBS NEWS (Sept. 18, 2025), <https://www.pbs.org/newshour/politics/trumps-moves-against-media-outlets-mirror-authoritarian-approaches-to-silencing-dissent>.

the right of free expression under the First Amendment of the Constitution, the President has threatened to use the government's power to license radio and television networks to revoke critics' licenses, has used the government's contracting power to persuade newspaper publishers, television station owners and media companies to curb their own journalists and broadcasters, and has sought to withhold Congressionally-authorized funds from non-profit public broadcasting channels that air programs distasteful to the President. The President has also used private personal litigation to intimidate movie studios, publishers and radio, television and internet networks into falling in line with his views (and, as noted below in Section VI, to enrich himself and his family along the way). Even more troubling, the President appeared to call for the arrest and execution of members of Congress for "seditious behavior" after those Congresspeople exercised their First Amendment rights to caution members of the military and national security communities to adhere to the standards of the Uniform Code of Military Justice, reminding them that they are not required to carry out any orders that violate the law or the Constitution.<sup>25</sup>

## **2. Censoring Colleges and Universities**

The President has attempted, using the pretext of combatting antisemitism, to curtail and ban the nation's colleges and universities, as well as their faculties and students, from exercising their rights to speech, assembly and uncensored scholarship by threatening and imposing economic and other sanctions on educational institutions, faculty and students who express opinions contrary to the President's wishes or fail to comply with Presidential directives with respect to their course offerings, faculty or staff composition or school administration. In violation of the First Amendment to the Constitution and applicable law, the President has purported to cancel federal research grants to Harvard University, Columbia University, Yale University, Princeton University and other institutions of higher learning, has retaliated against Harvard for its refusal to accept his demands by ordering the cancellation of all federal contracts with Harvard and attempting to prevent it from enrolling foreign students, all for the stated purpose of penalizing it economically for defying his demands.<sup>26</sup>

## **3. Censoring Libraries and Museums**

The President and his representatives have attempted to curtail and limit the books and other materials available to students in the nation's Military Academies and in college and school libraries and classrooms throughout the nation and to censor exhibits and educational programs at museums, national heritage sites and other places of public education, for the purpose of removing, in violation of the First Amendment, public access to those books, films, exhibits,

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<sup>25</sup> Saige Miller, *White House Condemns Democratic Lawmakers' Video But Backs Off Trump's Posts*, NPR (Nov. 20, 2025), <https://www.npr.org/2025/11/20/nx-s1-5615190/trump-democrats-military-video-seditious> See also Donald Trump (@realDonaldTrump), TRUTH SOCIAL (Nov. 20, 2025), <https://truthsocial.com/@realDonaldTrump/posts/115582417825161974>; Donald Trump (@realDonaldTrump), TRUTH SOCIAL (Nov. 20, 2025), <https://truthsocial.com/@realDonaldTrump/posts/115582703277798715> (referring to the Congress members' video as "SEDITIONOUS BEHAVIOR, punishable by DEATH!" [sic]).

<sup>26</sup> James Libresco, *Trump vs. Higher Ed, a Direct Attack on the Freedom of Speech*, PAC. SUN (Dec. 2, 2025), <https://pacificsun.com/trump-vs-higher-education-direct-attack-on-freedom-of-speech/>; Alan Blinder, *How Universities are Responding to Trump*, N.Y. TIMES (Dec. 1, 2025, <https://www.nytimes.com/article/trump-university-college.html>).

works of art or other materials that do not accord with the President’s preferences and personal view of American history and culture. As part of this campaign, the President has directed Washington D.C.’s Smithsonian Museum and the Museum of Natural History to revise their exhibits to reduce or eliminate adverse historical references to slavery, the country’s mistreatment of Native Americans or other subjects that offend the President’s wishes.<sup>27</sup>

## **D. Abusing Immigrants, Visa-Holders and Citizens**

### **1. Abusive Detention**

Attempting to circumvent statutory and Constitutional limits on his authority, the President has falsely declared large numbers of non-citizens seeking refugee status in the United States to be an “invasion” by a foreign nation and has directed and publicly encouraged the Secretary of Homeland Security, Kristi Noem, the President’s designated “Border Czar,” Tom Homan and the Secretary of State, Marco Rubio, to carry out, in blatant violation of the due process of law required by the Constitution, widespread detention and deportation of tens of thousands of non-citizens who were lawfully in the United States under existing visas or judicial orders.<sup>28</sup> The methods used by Immigration and Naturalization Enforcement (ICE) personnel in carrying out these detentions include masked agents in either plain clothes or combat gear arriving in unmarked or military vehicles<sup>29</sup> and, in Chicago, rappelling before dawn from a Blackhawk helicopter onto the roof of a residential building and forcibly entering, without judicial warrants, all of the apartments, then handcuffing and detaining the building’s residents (including children, seniors and citizens).<sup>30</sup>

These actions violate fundamental Constitutional safeguards of the Fourth Amendment against unreasonable searches and seizures, the Fifth Amendment requirement for due process of law and applicable standards for conduct by civilian police across the country. These brazen violations – publicly endorsed by the President and carried out by his agents – are intended not

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<sup>27</sup> Josh Marcus, *US Military Academies are Banning and Eliminating Majors to Align With Hegseth ‘Warrior’ Ideology*, THE INDEP. (Aug. 28, 2025), <https://www.the-independent.com/news/world/americas/us-politics/trump-hegseth-military-book-ban-dei-b2816028.html>; Sarah Mokrzycki, *What’s Happening With US Book Bans Under Trump?*, VICTORIA UNIV. (Feb. 19, 2025), <https://www.vu.edu.au/about-vu/news-events/news/whats-happening-with-us-book-bans-under-trump>.

<sup>28</sup> Maria Ramirez Uribe, *What Is the Legal Process for Deporting U.S. Green Card and Visa Holders*, PBS NEWS (Mar. 29, 2025), <https://www.pbs.org/newshour/politics/what-is-the-legal-process-for-deporting-u-s-green-card-and-visa-holders>.

<sup>29</sup> Allie Preston, *Masked and Unidentifiable: The Risks of Federal Law Enforcement Operating Without Identification*, CTR. FOR AM. PROGRESS (Aug. 28, 2025), <https://www.americanprogress.org/article/masked-and-unidentifiable-the-risks-of-federal-law-enforcement-operating-without-identification/> (cataloging ICE tactics and actions in multiple states). See also Nia Clark, *Several Elected Officials Call on NYPD to Arrest ICE Agents Acting Unlawfully*, SPECTRUM NEWS (Oct. 20, 2025), (quoting New York City Comptroller Brad Lander calling for New York City police to “protect New Yorkers and not allow them to be kidnapped by masked individuals who give no indication of who they are and who present no warrants”); Statement on Wearing of Masks by ICE Agents, NEW YORK CITY BAR ASSOCIATION, June 20, 2025, <https://www.nybar.org/press-releases/statement-on-wearing-of-masks-by-ice-agents/?back=1>.

<sup>30</sup> Nicholas Bogel-Burroughs, Julie Bosman, Hamed Aleaziz, Jesus Jiménez & Brent McDonald, *A Squalid Building, A Tip to the Feds, and then “Straight-Up Chaos”*, N.Y. TIMES (Oct. 19, 2025), <https://www.nytimes.com/2025/10/19/us/chicago-south-shores-border-patrol-raid.html?smid=url-share>.

only to prevent identification and accountability of the officers carrying out the abuses, but also to intimidate citizens and visitors from exercising their own rights. They bear a disturbing resemblance to the methods used during the “dirty wars” in Argentina, Chile and elsewhere where military regimes usurped power from democratic governments.<sup>31</sup>

These increasingly abusive roundups by ICE and other government agents at courthouses, workplaces, schools and places of worship have fallen most harshly not on convicted criminals, but on workers, heads of families and students contributing to their communities, many of whom are legally present in the country awaiting required asylum hearings before immigration courts, have valid visas or “green cards” or are already U.S. citizens swept up by ICE’s blatant racial profiling.<sup>32</sup> Detainees in New York and elsewhere have often been held for lengthy periods in such overcrowded and unsanitary conditions that Judge Lewis Kaplan of the U.S. District Court in Manhattan found them to violate minimum standards required for U.S. prison facilities and ordered ICE, over its continuing objections, to provide adequate beds, water, toilet facilities and sanitary conditions for detainees.<sup>33</sup>

The President, after briefly pausing roundups of farm and hotel workers, has also directed ICE to concentrate on immigrants found in cities like New York, Chicago and Los Angeles that the President regards as political enemies.<sup>34</sup> He has also, directly or through his agents, authorized ICE to prevent members of Congress from entering ICE detention facilities as permitted by law, and has barred members of Congress and state and local elected officials who seek to observe ICE roundups in public places or to question ICE or Department of Homeland Security officials about abusive detention actions, even resulting in the detention or arrest of local elected officials.<sup>35</sup> When the experienced Acting U.S. Attorney in Sacramento, California,

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<sup>31</sup> “Disappeared Ones” (*Desaparecidos*), *Argentina and Chile, 1970s–1980s*, ENCYCLOPEDIA OF U.S.-LATIN AMERICAN RELATIONS (Thomas M. Leonard, ed., CQ Press Books 2012) at 271, available at <https://doi.org/10.4135/9781608717613.n259>.

<sup>32</sup> Nicole Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days*, PROPUBLICA (Oct. 16, 2025), <https://www.propublica.org/article/immigration-dhs-american-citizens-arrested-detained-against-will> (finding that at least 170 U.S. citizens have been detained or held by immigration agents, often for days).

<sup>33</sup> *Mercado v. Noem*, No. 25-6568 (S.D.N.Y. Aug. 12, 2025) (granting temporary restraining order). See also Luis Ferré-Sadurní, *ICE Must Improve Conditions in N.Y.C. Migrant Holding Cells, Judge Rules*, N.Y. TIMES (Aug. 12, 2025), <https://www.nytimes.com/2025/08/12/nyregion/immigrant-detention-conditions-court-order.html?smid=url-share>.

<sup>34</sup> Aamer Madhani, *Trump Directs ICE to Expand Deportations in Democratic-run Cities, Undeterred by Protests*, AP NEWS (June 15, 2025), <https://apnews.com/article/trump-ice-deportations-protests-65fa8d64ea12a78a0ee0ebee008ee4d> (as the President called for increased immigration enforcement in these cities, he directed a pause in enforcement at farms, restaurants and hotels reportedly due to concern about how aggressive immigration enforcement was impacting those industries).

<sup>35</sup> See generally Immigration and Nationality Law Committee, *Report on the Trump Administration’s 2025 Changes to Immigration Law*, NEW YORK CITY BAR ASSOCIATION, <https://www.nycbar.org/reports/the-trump-administrations-early-2025-changes-to-immigration-law/> (last updated Oct. 10, 2025) See also Gwynne Hogan, *Congressmembers Barred from ICE Lockup in Lower Manhattan*, THE CITY (June 8, 2025), <https://www.thecity.nyc/2025/06/08/velazquez-espallat-ice-detention-federal-plaza/>; Cedar Attanasio, *Mayoral Candidate Brad Lander Arrested at Immigration Court*, AP NEWS (June 17, 2025), [https://apnews.com/article/brad-lander-nyc-immigration-court-arrest-6ed341297efab31a08a14421674d8ed8?utm\\_source=copy&utm\\_medium=share](https://apnews.com/article/brad-lander-nyc-immigration-court-arrest-6ed341297efab31a08a14421674d8ed8?utm_source=copy&utm_medium=share); Jake Offenhartz & Claudia Lauer,

cautioned ICE agents to comply with federal court orders and “probable cause” requirements for arrests, she was summarily fired in an email from a White House aide to the President.<sup>36</sup>

## 2. **Cruel and Unusual Punishment Abroad**

At the President’s direction, ICE has sought not only to expel non-citizen (and some citizen) detainees without the Constitutionally required due process of law, but has immediately transferred hundreds of those detainees to high-security, substandard prisons in countries with notoriously abusive human rights records, where prison conditions violate both U.S. and international standards, where the detainees are treated as if they had been convicted of crimes and where they have no connection with the imprisoning country, no access to courts, lawyers or family, no due process of law and no foreseeable prospect of release.<sup>37</sup> These unprecedented and grossly abusive practices have been publicly endorsed by the President, who continues, personally and through his Administration’s spokespeople, to refer to all such detainees as “rapists and criminals” or “monsters”<sup>38</sup> in the apparent belief that our nation will tolerate such cruel and unusual punishment so long as it is limited to immigrants (and just a few unfortunate citizens), despite the Constitutional protections guaranteed to all persons present in our country and the President’s own obligation to comply with the Constitution and enforce the laws of our nation.<sup>39</sup>

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*Mayor Baraka of Newark, New Jersey Arrested at Immigration Detention Center He Has Been Protesting*, AP NEWS (last updated May 9, 2025), [https://apnews.com/article/immigration-protest-ice-newark-mayor-arrested-5a2b3fef7da563c48d2f85831cf2194?utm\\_source=copy&utm\\_medium=share](https://apnews.com/article/immigration-protest-ice-newark-mayor-arrested-5a2b3fef7da563c48d2f85831cf2194?utm_source=copy&utm_medium=share) (describing the arrest of Newark, New Jersey Mayor Ras Baraka, who was detained outside an immigration detention center, and was, according to witnesses, handcuffed, and “put...in an unmarked car” by federal agents).

<sup>36</sup> Heather Knight & Hamed Aleaziz, *Trump Fired a U.S. Attorney Who Insisted on Following a Court Order*, N.Y. TIMES (Sept. 26, 2025), <https://www.nytimes.com/2025/09/26/us/trump-fires-us-attorney-california-immigration.html?smid=url-share>.

<sup>37</sup> Sergio Martínez-Beltrán & Manuel Rueda, *‘Hell on Earth’: Venezuelans Deported to El Salvador Mega-Prison Tell of Brutal Abuse*, NPR (July 27, 2025), <https://www.npr.org/2025/07/27/nx-s1-5479143/hell-on-earth-venezuelans-deported-to-el-salvador-mega-prison-tell-of-brutal-abuse>.

<sup>38</sup> See, e.g., The White House, *President Trump is Removing Killers, Rapists and Drug Dealers from Our Streets* (Mar. 4, 2025), <https://www.whitehouse.gov/articles/2025/03/president-trump-is-removing-killers-rapists-and-drug-dealers-from-our-streets/>; Jessica A. Botelho, *Trump Rids US of ‘Heinous Monsters’ Affiliated with Tren De Aragua*, *Leavitt Says*, ABC NEWS (Mar. 17, 2025), <https://abc3340.com/news/nation-world/trump-rids-us-of-heinous-monsters-affiliated-with-tren-de-aragua-leavitt-says-el-salvador-migrants-illegal-immigration-united-states-gang-members-crimes-criminals-ms-13-rape-rapists-sex-crimes-kidnapping-kidnap-predators-foreign-terrorists-laken-riley>. See also *Fact-Checking Over 12,000 of Donald Trump’s Quote About Immigrants*, THE MARSHALL PROJECT (Oct. 21, 2024), <https://www.themarshallproject.org/2024/10/21/fact-check-12000-trump-statements-immigrants> (cataloging and analyzing Donald Trump’s long-standing pattern of referring to immigrants as, among other derogatory and false terms, “criminals,” “killers,” “illegal monster[s]” who are “[p]oisoning our country”).

<sup>39</sup> Despite the President’s and DOJ’s claim that the U.S. had no way to require the return of those illegally detained abroad, the President ordered detainees in El Salvador transferred to Venezuela in exchange for the release of a U.S. citizen previously convicted of three murders in Spain and nine other individuals. In addition, after being held in a shipping container on a U.S. military base in Africa, those detainees sent to South Sudan, one of the poorest nations on Earth, remained imprisoned. Aicha El Hammar Castano & Shannon K. Kingston, *U.S. Army Veteran and Convicted Murderer Freed in Venezuela Prisoner Swap*, ABC NEWS (July 24, 2025), <https://abcnews.go.com/International/american-freed-venezuela-prisoner-swap-convicted-triple-murder/story?id=124054127>; Josh Gerstein & Kyle Cheney, *Judge Clears Way for U.S. to Deport 8 Men to South*

### 3. Visa Revocations for Protected Speech

At the President’s direction, the Department of State has undertaken a wide-ranging program to revoke visas of visiting students and scholars who engage in speech offensive to the Trump Administration, arguing that visa holders have no right to free speech under the Constitution and can be deported for engaging in such speech. On September 9, 2025, after a lengthy trial, federal judge William Young of the U.S. District Court for Massachusetts, “unequivocally” held that non-citizens lawfully present in the United States “have the same free speech rights as the rest of us.”<sup>40</sup> As Judge Young noted, “[t]he First Amendment does not draw President Trump’s invidious distinction and it is not to be found in our history or jurisprudence.... No one’s freedom of speech is unlimited, of course, but these limits are the same for both citizens and non-citizens alike.”<sup>41</sup> Notwithstanding Judge Young’s unambiguous ruling, the Department of State has continued, as recently as October 14, 2025, to attempt to deport visa-holders whose social media comments are offensive to the President, including at least six lawful visitors from Argentina, Brazil, Germany, Mexico, Paraguay and South Africa whose comments about Charlie Kirk were deemed offensive by the President or his appointees.<sup>42</sup>

### III. UNDERMINING JUDICIAL INDEPENDENCE

**The President and his agents have undermined our nation’s independent Judicial Branch by impugning the motives and competence of judges who rule against him, failing to timely comply with judicial orders, attacking law firms for representing clients disfavored by the President, undermining the independent Department of Justice and issuing blanket pardons to convicted January 6 defendants. These actions include:**

#### A. Attacking Federal Judges

The President and his agents have repeatedly criticized, insulted, and called for the impeachment of federal judges who issue decisions rejecting his claims or invalidating his or his Administration’s actions under the Constitution or applicable laws. These derogatory comments about the judiciary were best reflected in a May 26, 2025 Memorial Day social media post, in which the President publicly called those federal judges who insisted on due process of law for immigrants “monsters who want our country to go to hell” and that those judges “are on a mission to keep murderers, drug dealers, rapists, gang members and released prisoners from all over the world, in our country so they can rob, murderers (sic) and rape again” and “suffer from an ideology that is sick, and very dangerous for our country.”<sup>43</sup> After a three-judge panel of the

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*Sudan*, POLITICO (July 4, 2025), <https://www.politico.com/news/2025/07/04/trump-south-sudan-deportation-00440024>.

<sup>40</sup> *Am. Assoc. of Univ. Professors v. Rubio*, No. Case 1:25-cv-10685-WGY (D. Mass. filed Sept. 30, 2025), available at <https://docs.justia.com/cases/federal/district-courts/massachusetts/madce/1:2025cv10685/282460/261>.

<sup>41</sup> *Id.*

<sup>42</sup> Brandon Drenon, *US Revokes Visas Over Comments About Charlie Kirk’s Death*, BBC NEWS (Oct. 16, 2025), <https://bbc.com/news/articles/cz0x4e3zn2jo>.

<sup>43</sup> Donald Trump (@realDonaldTrump), TRUTH SOCIAL (May 26, 2025), <https://truthsocial.com/@realDonaldTrump/posts/114573871728757682> (original in all caps).

U.S. Court of International Trade issued a unanimous ruling finding the President’s broad-scale tariffs unauthorized and unconstitutional,<sup>44</sup> Stephen Miller, the President’s deputy chief of staff, called that decision a “judicial coup,” stated that Americans are “living under a judicial tyranny” and posted photos of the Trade Court’s judges on the internet.<sup>45</sup> When U.S. District Court Judge James Boasberg threatened to begin contempt proceedings against the Administration for failure to explain the unlawful deportation of migrants contrary to court orders, Attorney General Bondi’s office filed a formal disciplinary complaint against the judge accusing him of improper conduct for issuing orders unfavorable to the President.<sup>46</sup>

These are not isolated attacks. As federal Judge Thomas Cullen noted in dismissing the Trump Administration’s lawsuit against the Chief Judge of the U.S. District Court for Maryland, “over the past several months, principal officers of the Executive (and their spokespersons) have described federal district judges across the country as ‘left-wing,’ ‘liberal,’ ‘activists,’ ‘radical,’ ‘politically minded,’ ‘rogue,’ ‘unhinged,’ ‘outrageous, overzealous, [and] unconstitutional,’ ‘[c]rooked,’ and worse...[T]his concerted effort by the Executive to smear and impugn individual judges who rule against it is both unprecedented and unfortunate.”<sup>47</sup> These irresponsible personal attacks on the judiciary and individual judges are more than personal vitriol by the President and his agents; they serve to discredit and undermine public respect for our courts and encourage the very kinds of violence against judges and their families that Chief Justice John Roberts warned against in his most recent report on the state of the judiciary.<sup>48</sup> In addition, the President has fired 90 immigration judges nationwide, nearly a fifth of the total number – including, on December 1, 2025, eight immigration judges who served at 26 Federal Plaza in New York, the locus of many of the abuses by ICE agents discussed in Section II(D)(1).<sup>49</sup> According to some of the dismissed judges, the Administration’s actions appear to target judges who were considered “too lenient” on immigration matters, and were intended to “create a feeling of fear.” These firings not only impair the courts’ ability to adjudicate cases in a timely manner, stressing the already-overburdened immigration system, but the threat of further firings may, in the words of one former immigration judge, “impact...their ability to remain impartial and do their jobs fairly.”

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<sup>44</sup> *V.O.S. Selections Inc. v. United States*, No. 25-00066, slip op. 25-66 (Ct. Int’l Trade May 28, 2025), available at <https://www.cit.uscourts.gov/sites/cit/files/25-66.pdf>.

<sup>45</sup> Stephen Miller (@StephenM), X (May 28, 2025, 7:48 PM); Stephen Miller (@StephenM), X (May 29, 2025), <https://x.com/StephenM/status/1928065122657845516?lang=en>.

<sup>46</sup> Mark Sherman, *Justice Department Files Misconduct Complaint Against Federal Judge Handling Deportation Case*, AP NEWS (last updated July 28, 2025), <https://apnews.com/article/boasberg-salvador-venezuela-trump-misconduct-complaint-b5f5e982263b95f32e4229aefe312f12>. Kyle Cheney & Josh Gerstein, *Trump Admin Escalates Its War with the Courts – This Time Targeting Judge Boasberg*, POLITICO (July 28, 2025), <https://www.politico.com/news/2025/07/28/james-boasberg-justice-department-complaint-00480938>.

<sup>47</sup> *United States v. Russell*, No. 1:25-cv-02029 (D. Md. Aug. 26, 2025) (first two alterations in original), available at <https://law.justia.com/cases/federal/district-courts/maryland/mdcce/1:2025cv02029/584990/58/>.

<sup>48</sup> 2024 YEAR END REPORT ON THE FEDERAL JUDICIARY, SUP. CT. OF THE UNITED STATES, available at <https://www.supremecourt.gov/publicinfo/year-end/2024year-endreport.pdf>.

<sup>49</sup> Ana Ley, *Trump Administration Fires 8 Immigration Judges in New York*, N.Y. TIMES (Dec. 1, 2025), <https://www.nytimes.com/2025/12/01/nyregion/immigration-judges-fired-trump.html>.

As the City Bar recently noted in response to the belligerent statement by Deputy Attorney Todd Blanche that the Trump Administration is at “war” with the federal judiciary, such remarks not only threaten the safety of individual judges at a time when actual and threatened violence against the judiciary has reached record levels, but also undermine the ability of courts to function as the independent third branch of our federal government, as contemplated by the Constitution.<sup>50</sup>

## **B. Failing to Comply with Federal Court Orders**

The President and his representatives have repeatedly threatened to defy duly-issued federal court orders enjoining unlawful Presidential and agency actions. Beyond making such threats, the President and his representatives failed to comply with the federal order issued on April 18, 2025 by U.S. District Judge Brian Murphy (enjoining the transfer of deportees bound for South Sudan); the order issued on April 11, 2025 by U.S. District Judge Paula Xinis (directing the Trump Administration to return Kilmar Abrego Garcia from a high security prison in El Salvador following his wrongful transfer to that nation); the order issued on March 15, 2025 by U.S. District Judge James Boasberg (barring the Trump Administration from transferring, without due process of law, 238 deportees to a high security prison in El Salvador); and the order issued on May 7, 2025 by the U.S. Court of Appeals for the Second Circuit (barring the removal of Jordin Melgar-Salmeron to El Salvador pending completion of his removal appeal). Although some of these failures were belatedly remedied by the Trump Administration, the open defiance of court orders by the President and his subordinates is a dangerous omen for future respect for judicial decisions that conflict with the President’s wishes.<sup>51</sup> When the federal District Courts in Maryland adopted a rule requiring the Trump Administration to provide detained migrants a minimum of two days’ notice before deportation, the Administration, rather than directing ICE and the Department of Justice (DOJ) to comply with this minimal “due process” requirement, sued all the Maryland district court judges for adopting a procedure intended to assure that detainees could contact a lawyer or contest the basis for their removal, both fundamental to the due process rights that the Supreme Court had mandated.<sup>52</sup>

In other cases, the President’s representatives have simply delayed complying with restraining orders or preliminary injunctions in cases challenging unlawful summary deportations, foreign detentions, visa revocations, government layoffs, removal of duly

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<sup>50</sup> Press Release, New York City Bar Association, Deputy Attorney General’s “War” on the Judiciary is an Assault on Judicial Independence (Nov. 17, 2025), <https://www.nycbar.org/press-releases/deputy-attorney-generals-war-on-the-judiciary-is-an-assault-on-judicial-independence/>.

<sup>51</sup> The failure to comply with Judge Xinis’s order with respect to Mr. Garcia was later remedied by his return, after repeated resistance by the Trump Administration, to face a new criminal complaint for alleged conduct more than two years before his deportation. As discussed in footnote 39, *supra*, most of the remaining 238 deportees who had been sent to El Salvador without the required due process were later sent by the Trump Administration to Venezuela in exchange for that government’s release of one American citizen and other individuals, a transaction that demonstrated the falsity of the Administration’s repeated statements that it had no control over the disposition or return of the deportees improperly sent to El Salvador. The detainees sent to South Sudan without due process have not yet been returned or, to the best of our knowledge, released by that country.

<sup>52</sup> *Trump Administration Sues All of Maryland’s Federal Judges Over Deportation Order*, NPR (June 26, 2025), <https://www.npr.org/2025/06/26/nx-s1-5445843/justice-department-maryland-judges-deportation>.

appointed agency officials and cutoffs of U.S. Agency for International Development (USAID) food and medical assistance, all in apparent efforts to frustrate the purpose of those court orders by carrying out the challenged activities before the courts could halt them. The President and his agents delayed in returning individuals wrongly deported to foreign prisons, in rehiring federal employees improperly terminated, in resuming illegally terminated programs at home or abroad, or in identifying the agency or White House officials responsible for that defiance or non-compliance with federal court orders.<sup>53</sup>

When the Supreme Court (and in some cases, a federal appeals court) later stayed the preliminary injunctions issued by lower courts during the pendency of those litigations, the Trump Administration continued its pattern of non-compliance as the litigation continued, even in the face of district court findings that by its actions were likely unlawful. Deportations have continued (and significantly increased) without due process, terminated federal workers have been unable to resume work and essential domestic and international programs to protect public health and safety have, for all practical purposes, been placed on hold or eliminated. This practice understandably leads the public to question the value of law itself when actions that are preliminarily held by district courts to be unlawful continue to be carried out by the President's designees and the challenged conduct – and its consequences – becomes an accepted fact of life both at home and abroad.

### **C. Attacking Law Firms to Limit Judicial Review**

The President has also attempted to limit judicial review of his actions by issuing “Executive Orders” against nine private law firms that employed or represented critics of the President or asserted legal claims on behalf of clients contrary to the President’s wishes (including disputing the President’s false claims of alleged “fraud” in the 2020 Presidential election). The clear purpose of these actions was to intimidate lawyers against bringing legal challenges to any Presidential actions and thereby limit judicial oversight of those actions. Although four of the named firms successfully challenged their Executive Orders as unconstitutional,<sup>54</sup> at least nine other targeted firms entered into “voluntary” agreements with the President to take specified hiring and internal actions and to devote nearly \$1 billion of professional time to “causes favored by the President.”<sup>55</sup> By so doing, these firms have significantly curtailed their ability to represent clients adverse to Presidential interests or “priorities.”<sup>56</sup> The American Bar Association, the City Bar and other bar associations across the

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<sup>53</sup> Justin Jouvenal, *Trump officials accused of defying 1 in 3 judges who ruled against him*,

THE WASHINGTON POST (July 21, 2025), [www.washingtonpost.com/politics/2025/07/21/trump-court-orders-defy-noncompliance-marshals-judges](https://www.washingtonpost.com/politics/2025/07/21/trump-court-orders-defy-noncompliance-marshals-judges).

<sup>54</sup> *Perkins Coie LLP v. U.S. Dep’t of Justice*, No. 25-716 (D.D.C. May 2, 2025); *Jenner & Block LLP v. U.S. Dep’t of Justice*, No. 25-916 (D.D.C. May 23, 2025); *Wilmer Cutler Pickering Hale & Dorr LLP v. Exec. Office of the President*, No. 25-917 (D.D.C. May 27, 2025); *Susman Godfrey LLP v. Exec. Office of the President*, No. 25-1107 (D.D.C. June 27, 2025) (joining the three previous rulings in finding the President’s order “unconstitutional from beginning to end”).

<sup>55</sup> Daniel Barnes, *Inside the Fallout at Paul, Weiss After the Firm’s Deal with Trump*, POLITICO (June 29, 2025), <https://www.politico.com/news/2025/06/29/paul-weiss-brad-karp-trump-fallout-00420354>.

<sup>56</sup> As the federal district court noted in invalidating one Executive Order directed at law firms, the first act of would-be tyrants, according to Shakespeare’s Richard III, is to “kill all the lawyers” and thus be free of judicial oversight.

country have similarly condemned the President’s attempts to curtail the role of our courts by punishing and intimidating lawyers who seek redress for their clients for unlawful Presidential actions.<sup>57</sup>

#### **D. Punishing Department of Justice Prosecutors, FBI Agents and Political Enemies**

The President has encouraged, authorized and directed Attorney General Pam Bondi to discharge, reassign or otherwise punish highly experienced career attorneys and investigators in DOJ who had any participation in previous DOJ investigations into the January 6, 2021 attack on the Capitol or the investigations of the President’s removal of classified documents from the White House, or who decline on professional grounds to advance false or frivolous positions on behalf of the current Trump Administration. Contrary to his stated goal of eliminating political “weaponization” of DOJ, the President has directed the Attorney General and Kash Patel, the Director of the Federal Bureau of Investigation (FBI), to pursue criminal investigations and charges against individuals whom the President perceives as his enemies whether or not there is an independent basis for such prosecutorial actions.<sup>58</sup>

As part of this effort, the President publicly demanded that James Comey, former director of the FBI, be indicted “NOW” for his role in investigating alleged contacts between Russia and the 2016 Trump campaign.<sup>59</sup> The President then replaced the Virginia U.S. Attorney (who had concluded that there was no basis for that indictment) with a compliant White House staff lawyer with no prosecutorial experience, who, as acting U.S. Attorney, secured the requested Comey indictment. Shortly thereafter, the same acting U.S. Attorney secured an indictment, as demanded by the President, of Letitia James, the New York Attorney General who successfully

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*Perkins Coie LLP v. U.S. Dep’t of Justice*, No. 25-716 (D.D.C. May 2, 2025), available at <https://law.justia.com/cases/federal/district-courts/district-of-columbia/dcdce/1:2025cv00716/278290/185/>.

<sup>57</sup> William R. Bay, President of the American Bar Association, Statement, The ABA Rejects Efforts to Undermine the Courts and the Legal Profession (Mar. 3, 2025), [https://www.americanbar.org/news/abanews/aba-news-archives/2025/03/aba-rejects-efforts-to-undermine-courts-and-legal-profession/?utm\\_source=sfmc&utm\\_medium=email&utm\\_campaign=YOURABA&promo=YOURABA&RefId=&utm\\_id=978816&sfmc\\_id=46721839](https://www.americanbar.org/news/abanews/aba-news-archives/2025/03/aba-rejects-efforts-to-undermine-courts-and-legal-profession/?utm_source=sfmc&utm_medium=email&utm_campaign=YOURABA&promo=YOURABA&RefId=&utm_id=978816&sfmc_id=46721839); Press Release, New York City Bar Association, Bar Associations File Amicus Brief in Support of Perkins Coie (Apr. 8, 2025), <https://www.nycbar.org/press-releases/bar-associations-file-amicus-brief-in-support-of-perkins-coie/>.

*See also* Brief for Bar Associations as Amici Curiae, *Perkins Coie LLP v. U.S. Dep’t of Justice*, No. 25-716 (D.D.C. May 2, 2025), available at <https://www.nycbar.org/wp-content/uploads/2025/04/83-1-Brief.pdf> (representing sixteen bar associations from seven states in declaring the President’s order “not only blatantly illegal” but “a naked attempt to instill fear in the legal profession and intimidate lawyers into submission, thereby co-opting the bar to be subservient to the executive branch, undermining the judiciary’s ability to check executive power, and striking at the heart of the rule of law”); *American Bar Association Files Suit to Halt Government Intimidation of Lawyers and Law Firms*, ABA NEWS (June 16, 2025), <https://www.americanbar.org/news/abanews/aba-news-archives/2025/06/aba-files-suit-to-halt-govt-intimidation/>.

<sup>58</sup> CNN Staff, *Donald Trump Touts Political Firings and Retribution as He Begins a Government Overhaul at DOJ, FBI and State*, WTTW NEWS (Jan. 21, 2025), <https://news.wttw.com/2025/01/21/donald-trump-touts-political-firings-and-retribution-he-begins-government-overhaul-doj>.

<sup>59</sup> Donald Trump (@realDonaldTrump), TRUTH SOCIAL (Sept. 20, 2025), <https://truthsocial.com/@realDonaldTrump/115239044548033727>.

sued the President for commercial fraud while he was a private citizen. Other investigations demanded by the President include Jack Smith, the DOJ's own special prosecutor in the January 6 and Mar-a-Lago indictments, Senator Adam Schiff, who led the first impeachment of President Trump, John Bolton, the President's national security advisor during his first term who criticized his handling of Russian and other negotiations, and Fani Willis, the Georgia District Attorney who had secured an indictment of the President and others for their roles in attempting to overturn Georgia's 2020 Presidential elections results. As these actions demonstrate (and as this Association recently noted), DOJ's leadership has, at the President's direction, embarked on a path that former Supreme Court Justice Robert Jackson warned against more than 80 years ago<sup>60</sup> and, "in so doing, is using its vast powers as the personal cudgel of the President, undermining the impartial administration of justice."<sup>61</sup>

### **E. January 6 Pardons**

The President indiscriminately pardoned more than 1,500 individuals duly convicted of federal crimes (in some cases including insurrection, sedition, aggravated assault and other serious felonies) for their violent attack on the capitol on January 6, 2021, in an attempt to prevent Congress from fulfilling its Constitutional duty to certify the results of the 2020 presidential election. All such defendants had either pleaded guilty to those charges or been convicted after trial by juries of their fellow citizens. The President's blanket pardon sent an unwarranted and dangerous message to the public that the federal courts had in some way mistreated those whom the President repeatedly called "patriots" for their role in storming the Capitol on his behalf.

## **IV. UNDERMINING CONGRESS AND ITS FEDERAL PROGRAMS**

**The President has abused his authority by violating Constitutional and statutory limits on the use of the armed forces and by attempting to dismantle federal agencies and programs that Congress has created to protect the health, welfare, natural resources and economic security of the American people. Specifically, the President and his representatives have sought to undermine the independent authority of Congress and the viability of its federal programs, endangering the citizens whom the President is entrusted to protect. These actions include:**

### **A. Violating Constitutional and Legal Limitations on the Use of Armed Force Against Foreign Nations**

On June 21, 2025, the President ordered U.S. Air Force and Navy forces to attack nuclear processing facilities in the nation of Iran, an act of war taken by the President without either a

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<sup>60</sup> Robert H. Jackson, Attorney General of the United States, *The Federal Prosecutor*, Address at the Second Annual Conference of United States Attorneys (April 1940), available at <https://www.justice.gov/sites/default/files/ag/legacy/2011/09/16/04-01-1940.pdf>.

<sup>61</sup> Press Release, New York City Bar Association, Statement on the Indictment of New York Attorney General Letitia James (Oct. 10, 2025), <https://www.nycbar.org/press-releases/statement-on-the-indictment-of-new-york-attorney-general-letitia-james/>.

declaration of war or prior authorization by Congress.<sup>62</sup> In September and again in October, 2025, the President authorized at least 22 separate attacks by U.S. armed forces on private Venezuelan and Colombian vessels, killing a total of at least 80 people described by the President as drug traffickers, recently extending these illegal actions into the Pacific Ocean.<sup>63</sup> As the City Bar has noted, these attacks were also taken without either a declaration of war or prior authorization by Congress and were unlawful.<sup>64</sup> Article I, Section 8 of the Constitution reserves to Congress the power to declare war, and the War Powers Resolution of 1973 makes clear that the President must secure Congressional approval for any introduction of U.S. forces into hostilities (except for a national emergency created by an attack on the U.S., its territories or its armed forces). A foundational principle of our democracy is that no single individual, even the President, has the right to commence a war or authorize military attacks of the type directed against Iran and the Venezuelan vessels without approval of the American people through their Congressional representatives. President Trump's blatant violation of this obligation to seek Congressional approval for his actions constitutes a grave breach of his obligations to Congress and to the People.<sup>65</sup> His statement that he has unilaterally "determined" that a state of war exists between the United States and an unidentified drug trafficking network makes that breach worse, not better. Press reports also indicate that the Secretary of Defense, presumably with the President's approval, may also have ordered the killing of all crew members, including survivors, on at least some of the attacked vessels, also a clear violation of both U.S. military law and international treaty obligations.<sup>66</sup>

## **B. DOGE Actions Dismantling the Federal workforce and Obtaining Confidential Information on Citizens**

The president authorized and directed a private citizen and campaign donor, Elon Musk, to create a so-called "Department of Government Efficiency" (DOGE) and to use DOGE to impose, directly or indirectly, severe staffing and program cuts in Congressionally authorized

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<sup>62</sup> Andrew Solender, *Dems Join GOP to Kill Vote Impeaching Trump over Iran Strikes*, AXIOS (June 24, 2025), <https://www.axios.com/2025/06/24/trump-impeachment-trump-iran-al-green-democrats>.

<sup>63</sup> Eric Schmitt, Charlie Savage & Chris Cameron, *U.S. Strikes 2<sup>nd</sup> Boat in Pacific as Antidrug Operation Expands*, N.Y. TIMES (Oct. 23, 2025), <https://www.nytimes.com/2025/10/22/us/politics/trump-drug-boat-strike-colombia.html?smid=url-share>.

<sup>64</sup> See Press Release, New York City Bar Association, *Unlawful Attacks on Venezuelan Vessels* (Oct. 6, 2025), <https://www.nycbar.org/press-releases/unlawful-attacks-on-venezuelan-vessels/> (condemning the President's attacks on Venezuelan vessels, which at the time had resulted in at least 17 deaths, as "unlawful executions").

<sup>65</sup> Following the September 11, 2001 Al Qaeda attacks on the World Trade Center and Washington, D.C., Congress adopted an "Authorization for Use of Military Force" authorizing the President to use military force against "those nations, organizations, or persons he determines planned, authorized, committed, or aided the terrorist attacks that occurred on September 11, 2001, or harbored such organizations or persons..." S.J. Res. 23 (H.R.J. Res. 64), 107th Cong. (2001), <https://www.congress.gov/bill/107th-congress/house-joint-resolution/64>. Although that authorization has been used to justify military actions in Afghanistan, Libya and Syria, it clearly provides no support for the actions taken against Iran or the Venezuelan vessels.

<sup>66</sup> Jack Goldsmith, *A Dishonorable Strike*, EXECUTIVE FUNCTIONS (Nov. 28, 2025), <https://www.execfunctions.org/p/a-dishonorable-strike>; Victoria Bisset et al., *Congressional Committees to Scrutinize U.S. Killing of Boat Strike Survivors*, WASH. POST (Nov. 29, 2025), <https://www.washingtonpost.com/national-security/2025/11/29/hegseth-caribbean-strikes-kill-order-reaction/> (discussing the bipartisan inquiry into the killings initiated by the House and Senate Armed Services Committees).

departments, agencies and non-profit programs for the purpose and with the effect of substantially dismantling and disabling essential government departments and programs that were funded by Congress to render essential services to and on behalf of the American people. Neither the President nor DOGE appeared to have authority to dismantle such departments, agencies and programs, and their attempts to do so appear to violate their enabling statutes and the federal Non-Impoundment Act of 1974, which requires Congress to approve any proposed Presidential rescission of appropriated funds beyond a 45-day period. As it has in other contexts, however, the Supreme Court stayed enforcement of a District Court decision invalidating the Presidential executive order authorizing many of the agency layoffs, though individual agency actions to terminate staff remain subject to lower court review.<sup>67</sup> During the recent government shutdown, the President further abused his authority by directing his appointees to fire thousands of additional federal employees without cause,<sup>68</sup> reducing the ability of federal agencies to serve the nation's needs, and threatened to withhold salaries from furloughed employees based on their political allegiance.<sup>69</sup> The President also authorized and permitted DOGE and its agents to improperly obtain confidential personal information on hundreds of millions of Americans, including their social security numbers, tax and financial information, medical and family records and other personal information, in violation of statutory and regulatory requirements to hold that information in confidential form for the limited purpose for which it was acquired.<sup>70</sup>

### C. Jeopardizing Social Security Payments

The President authorized DOGE and the Acting Director of the Social Security Administration (SSA), Leland Dudek, to effectively dismantle the SSA's staff and to use erroneous and fabricated data to severely compromise the SSA's ability to serve the needs of its beneficiaries in a timely, responsible and reliable way.<sup>71</sup> Although SSA later retreated, after adverse comments from a federal district court, from some of its initial threats, its broad staff reductions weakened SSA's ability to provide timely assistance and information to tens of millions of Americans who have contributed to that program and rely on its regular monthly payments for rent, mortgage payments, credit card obligations, food and other essential services.

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<sup>67</sup> *Trump v. Fed'n of Gov't Emps.*, 606 U.S. —, No. 24A1174 (July 8, 2025) (unpublished opinion), available at [https://www.supremecourt.gov/opinions/24pdf/24a1174\\_h3ci.pdf](https://www.supremecourt.gov/opinions/24pdf/24a1174_h3ci.pdf).

<sup>68</sup> Tami Luhby, Annie Grayer & Alayna Treene, *Trump Administration Lays Off Thousands of Federal Workers During Government Shutdown*, CNN (Oct. 10, 2025), <https://www.cnn.com/2025/10/10/politics/government-shutdown-federal-worker-firings>.

<sup>69</sup> Eric Katz, *Trump Says He Can Pick and Choose Which Feds Get Back Pay. Republicans in Congress Mostly Disagree*, GOV'T EXEC. (Oct. 7, 2025), <https://www.govexec.com/pay-benefits/2025/10/trump-says-he-can-pick-and-choose-which-feds-get-back-pay-republicans-congress-mostly-disagree/408668/>.

<sup>70</sup> Celine McNicholas & Ben Zipperer, *Trump is Enabling Musk and DOGE to Flout Conflicts of Interest*, ECON. POL'Y INST. (May 7, 2025), <https://www.epi.org/publication/trump-is-enabling-musk-and-doge-to-flout-conflicts-of-interest-what-is-the-potential-cost-to-u-s-families/>.

<sup>71</sup> Alistair Higham, *Social Security Issues Update On 'Devastating' Erroneous Death Reports*, NEWSWEEK (Mar. 17, 2025), <https://www.newsweek.com/social-security-update-erroneous-death-reports-2045763>; Fatima Hussein, *Social Security Admin Plans to Cut Field Office Visits by 50%. What It Means For You*, ABC NEWS (Dec. 5, 2025), <https://abcnews.go.com/US/wireStory/social-security-administration-plans-cut-field-office-visits-128157984>.

## D. Undermining Public Health

With the President’s encouragement to “go wild on health,”<sup>72</sup> the Secretary of Health and Human Services (HHS), Robert F. Kennedy, Jr., has twice replaced highly qualified heads of the Centers for Disease Control with less qualified and ideologically-driven advisers (most recently, a former speechwriter who is neither a doctor nor a scientist), replaced the entire HHS Advisory Committee on Immunization Practices with supporters of his own unfounded hostility to vaccines, reduced or eliminated essential vaccine programs for the prevention of bird flu, measles, Covid and other highly-contagious diseases, curtailed or eliminated veterans’ counseling and treatment, halted clinical testing programs already underway for cancer, Alzheimer’s and other diseases, substantially reduced nutrition assistance for the elderly and compromised the present and future health of tens of millions of Americans, especially young children and the elderly by exposing the nation to a resurgence of measles, polio, Covid and other life-threatening communicable diseases.<sup>73</sup> Many of these actions also have clearly unmistakable impacts on vulnerable groups disfavored by the President, prompting one federal court to characterize the termination of research grants by the National Institutes of Health as “palpable” racial discrimination and discrimination against the nation’s LGBTQ community.<sup>74</sup>

## E. Threatening Public Education

The President has encouraged and authorized the Secretary of Education, Linda McMahon, to defund and dismantle the nation’s public schools and replace them wherever feasible with private and parochial schools with ideological or religious commitments more to her or the President’s personal liking, to eliminate Head Start and other pre-school programs, to reduce funding for public school districts, teachers and teacher training programs below the levels authorized by Congress, to limit the teaching of American history and other subjects in public and private education to conform to the President’s “agenda,” and to penalize and reduce funding for states and public school districts that do not revise their classroom curricula, textbooks and libraries to conform to the President’s wishes.<sup>75</sup> Although a federal district court invalidated the Secretary’s efforts to essentially dismantle the Department of Education, the Supreme Court stayed that decision in July 2025, over a dissent by Justice Sotomayor pointing to the harm likely to be suffered by students and families while the dismantling went forward.<sup>76</sup> In

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<sup>72</sup> Dan Diamond et al., *RFK Jr. Set for Major Food, Health Role in Potential Trump Administration*, WASH. POST (Oct. 31, 2024), <https://www.washingtonpost.com/politics/2024/10/31/rfk-trump-administration-health-food-safety/>.

<sup>73</sup> See News Release, Georges C. Benjamin, M.D., Exec. Director, American Public Health Association, Secretary Kennedy and His Policies Are A Danger to the Public’s Health, (Apr. 9, 2025), <https://www.apha.org/news-and-media/news-releases/apha-news-releases/secretary-kennedy-and-his-policies-are-a-danger-to-the-public%E2%80%99s-health>; Elizabeth Jacobs & James Alwine, *RFK Jr.’s Deepening Threat to Public Health*, THE PROGRESSIVE MAG. (Dec 8, 2025), <https://progressive.org/op-eds/rfk-jr-deepening-threat-to-public-health-jacobs-alwine-20251208/>.

<sup>74</sup> *Am. Pub. Health Assoc. v. Nat’l Insts. Of Health*, No. 1:25-cv-10787 (D. Mass filed Apr. 2, 2025), available at [https://www.supremecourt.gov/DocketPDF/25/25A103/368002/20250724161305493\\_APHA%20Stay%20Application%20Appendix.pdf](https://www.supremecourt.gov/DocketPDF/25/25A103/368002/20250724161305493_APHA%20Stay%20Application%20Appendix.pdf).

<sup>75</sup> Michael C. Bender, *Trump Administration Announces Steps to Dismantle Education Department*, N.Y. TIMES (Nov. 18, 2025), <https://www.nytimes.com/2025/11/18/us/politics/trump-education-department.html>.

<sup>76</sup> *McMahon v. New York*, 606 U.S. —, No. 24A1203 (July 14, 2025) (Sotomayor, J., dissenting), available at [https://www.supremecourt.gov/opinions/24pdf/24a1203\\_new\\_6j37.pdf](https://www.supremecourt.gov/opinions/24pdf/24a1203_new_6j37.pdf).

November 2025, taking further advantage of that stay, Secretary McMahon announced the dismantling of most of its remaining programs by transferring their functions to the Department of Labor and other departments.<sup>77</sup>

## F. Eroding Environmental and Disaster Protection

The President has directed and encouraged Lee Zeldin, the Administrator of the Environmental Protection Agency (EPA) to systematically reduce and dismantle the nation's commitments under the Clean Air Act, the Clean Water Act, the National Environmental Policy Act, the Inflation Reduction Act and other Congressional laws to protect the health, safety and welfare of the American people and their natural resources, including reducing or eliminating experienced staff dedicated to enforcing those statutes, eliminating or substantially reducing programs authorized by Congress to assist states in improving air and water quality and, contrary to established science, attempting to rescind EPA's "endangerment finding" for greenhouse gases.<sup>78</sup> In the face of incontrovertible evidence of the impacts of climate change, the President has continued to deny the fact of climate change, has reduced or eliminated federal programs encouraging the development of renewable energy sources and has reduced or abandoned Congressionally authorized programs to assist states and municipalities to combat fire, heat, community displacement and other impacts of climate change and natural disasters.<sup>79</sup> Despite the increasing frequency and severity of natural disasters and flooding, and warnings from highly experienced career officials at the Federal Emergency Management Administration (FEMA), the President has substantially reduced staffing for FEMA and has removed senior officials who refused to endorse his belief that FEMA's disaster assistance to and coordination with state governments should be substantially reduced or eliminated.<sup>80</sup>

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<sup>77</sup> Lexi Lonas Cochran, *McMahon's First Year Had Decimated the Education Department, But Full Elimination Hovers Out of Reach*, THE HILL (Dec. 9, 2025), <https://thehill.com/homenews/education/5639127-mcmahon-trump-education-department/>.

<sup>78</sup> Cathleen Kelly, *The Trump Administration's Attack on Environmental Protections will Increase Cancer-Causing Pollution*, CTR. FOR AM. PROGRESS (Sept. 16, 2025), <https://www.americanprogress.org/article/the-trump-administrations-attack-on-environmental-protections-will-increase-cancer-causing-pollution/>; Maxine Joselow, *In One Week, Trump Moves to Reshape U.S. Environmental Policy*, N.Y. TIMES (Nov. 22, 2025), <https://www.nytimes.com/2025/11/22/climate/trump-environmental-policy-week.html?smid=url-share>; Press Release, U.S. Environmental Protection Agency, *EPA Releases Proposal to Rescind Obama-Era Endangerment Finding, Regulations that Paved the Way for Electric Vehicle Mandates*, (July 29, 2025), <https://www.epa.gov/newsreleases/epa-releases-proposal-rescind-obama-era-endangerment-finding-regulations-paved-way>.

For a listing of Trump Administration actions proposing to rescind or modify climate-related protection, see "Climate Backtracker," SABIN CENTER FOR CLIMATE CHANGE LAW, COLUMBIA UNIVERSITY (last updated Dec. 3, 2025), <https://climate.law.columbia.edu/content/climate-backtracker>.

<sup>79</sup> News Release, Steven Cohen, Ph.D., Columbia School of Professional Studies, *Lee Zeldin and the Birth of the Environmental Destruction Agency (EDA)* (Mar. 17, 2025), <https://sps.columbia.edu/news/lee-zeldin-and-birth-environmental-destruction-agency-eda>; Maxine Joselow, *MAHA Activists Urge Trump to Fire His E.P.A. Administrator*, N.Y. TIMES (Dec. 5, 2025), <https://www.nytimes.com/2025/12/05/climate/maha-lee-zeldin-pesticides.html>.

<sup>80</sup> Andrew Rumbach et al., *Proposed Cuts to Federal Disaster Assistance Will Hit States Just as Hurricane Season Ramps Up*, URBAN WIRE (May 2, 2025), <https://www.urban.org/urban-wire/proposed-cuts-federal-disaster-assistance-will-hit-states-just-hurricane-season-ramps>; Joe Walsh & Nicole Sganga, *FEMA Staff Argue Trump*

## **G. Reducing Illegal Gun Monitoring**

As multiple-victim gun violence continues unabated in schools, churches and other gathering places, the President has directed Attorney General Bondi to roll back a range of federal oversight programs carried out by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) that are intended to slow the spread of illegal guns in the United States. In addition to reducing ATF staff generally, the Attorney General has curtailed oversight of gun dealers who falsify records or skip background checks on purchasers and has moved to reduce or eliminate oversight of private gun sales, “ghost guns” and products used to convert handguns into rifle-like weapons.<sup>81</sup>

## **H. Undermining Specialized Agencies’ Independence**

The President has sought to undermine the independence of Congressionally-established specialized agencies by unlawfully removing (or attempting to remove) duly-appointed commissioners or directors from the National Labor Relations Board, the Federal Election Commission, the Federal Trade Commission, the Voice of America and the Federal Reserve Board, an action that not only threatens that Board’s independence but undermines domestic and global confidence in its decisions.<sup>82</sup> He has also summarily fired, without cause and in violation of applicable law, independent Inspectors General from more than a dozen administrative agencies and executive departments, all in an effort to curtail independent review of his or his appointees’ actions that are in violation of law, constitute waste or fraud or are contrary to their agencies’ statutory purpose.<sup>83</sup>

## **I. Exceeding and Abusing Tariff Authority**

The President appears to have exceeded and abused his delegated authority with respect to tariffs on international trade by declaring an “economic emergency” in order to evade the statutory limits on that authority and Congressional oversight of his unilateral tariff actions. By purporting to impose extreme tariffs on substantially all U.S. international commerce, the President has compromised the economic well-being and security of American businesses, consumers and investors, greatly damaged the U.S. and world economy, violated our nation’s obligations under the General Agreement on Tariffs and Trade (GATT) and the U.S.-Mexico-Canada Agreement (USMCA) and undermined our nation’s role, and our nation’s currency, as

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*Administration’s Cuts Risk Undoing Progress Since Hurricane Katrina*, CBS NEWS (Aug. 26, 2025), <https://www.cbsnews.com/news/fema-staff-argue-trump-administration-cuts-risk-undoing-progress-since-hurricane-katrina/>; Thomas Frank, FEMA Canceled \$11B in Disaster Payments to States, POLITICO PRO (Oct. 7, 2025), <https://subscriber.politicopro.com/article/eenews/2025/10/07/fema-canceled-11b-in-disaster-payments-to-states-00588999>.

<sup>81</sup> Meg Anderson, *Trump Administration Targets ATF, with Plans to Cut Jobs and Ease Gun Restrictions*, NPR (July 2, 2025), <https://www.npr.org/2025/07/02/nx-s1-5440343/trump-administration-atf-jobs-gun-restrictions>.

<sup>82</sup> Press Release, Lauren McFerran & Celine McNicholas, Economic Policy Institute, *Trump’s Assault on Independent Agencies Endangers Us All* (Oct. 22, 2025), <https://www.epi.org/publication/trumps-assault-on-independent-agencies-endangers-us-all/>.

<sup>83</sup> Zeke Miller, Eric Tucker & Will Weissert, *Trump Uses Mass Firing to Remove Independent Inspectors General at a Series of Agencies*, AP NEWS (Jan. 25, 2025), <https://apnews.com/article/trump-inspectors-general-fired-congress-unlawful-4e8bc57e132c3f9a7f1c2a3754359993>.

the international standard for economic stability and value. On May 29, 2025, the U.S. Court of International Trade held the President’s unilateral tariffs to be invalid because the purported “emergency” on which they were based did not exist (but stayed enforcement of its decision pending review by the Federal Circuit Court of Appeals). On August 29, the Federal Circuit Court of Appeals affirmed the International Trade Court’s decision, similarly finding that the bulk of the President’s tariffs were unauthorized and similarly staying enforcement until a decision is rendered by the Supreme Court, which is currently pending. Notwithstanding both of the lower court decisions holding his actions invalid, the President has continued to insist on his unilateral tariff actions and, by so doing, pursued a policy creating hardship for U.S. consumers and businesses, arbitrary barriers to international commerce and a self-induced restitution challenge for unlawfully imposed charges if the lower court decisions are upheld by the Supreme Court.

## V. COMPROMISING NATIONAL SECURITY

**The President has abused his authority in the conduct of the foreign relations of our nation by attacking a foreign nation and foreign vessels in violation of international law, condoning misconduct in the Department of Defense, abandoning essential international programs that the U.S. helped create and banning foreign visitors based on their race or religion. These actions include:**

### A. Unlawful Use of Force Against Foreign Nations

As discussed above, the President directed the use of U.S. armed forces against Iran in June and against private Venezuelan and Colombian vessels in September, October and November 2025, in each case without Congressional approval, as required under U.S. law. Those actions also violated our nation’s obligations under the United Nations (U.N.) Charter, which prohibits the use of force against another state unless authorized by the U.N. Security Council or taken in self-defense (the attacks on the Venezuelan vessels may also violate the Charter of the Organization of American States insofar as they are part of an attempt to destabilize the Venezuelan government).<sup>84</sup> The President has unilaterally declared all Venezuelan airspace “closed” to foreign aircraft and positioned major U.S. military assets, including our largest aircraft carrier, off the coast of Venezuela in an overt threat to that nation’s territory and government.<sup>85</sup> The President’s action in authorizing such unprovoked and unlawful acts undermines fundamental principles of international law and treaty obligations that the United States helped develop and, by so doing, compromises our nation’s ability to insist that other states comply with those obligations, including those with respect to the use of armed force to settle disputes. Even the President’s claim that the attacks on Venezuelan vessels (and, potentially, Venezuela itself) are necessary to combat narcotics trafficking from that nation is undermined by the President’s pardon of the former President of Honduras, Juan Orlando Hernández, who was convicted and sentenced to 45 years in prison in 2025 by a U.S. district

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<sup>84</sup> Charter of the Organization of American States (Apr. 30, 1948), available at <https://treaties.un.org/doc/Publication/UNTS/Volume%20119/volume-119-I-1609-English.pdf>.

<sup>85</sup> Julian E. Barnes & Helene Cooper, *Trump Declares Venezuelan Airspace Closed*, N.Y. TIMES (Nov. 29, 2025), <https://www.nytimes.com/2025/11/29/us/politics/trump-venezuela-maduro-airspace.html>.

court for controlling a Honduran narcotics network that transported large amounts of cocaine into the U.S.<sup>86</sup>

## **B. Condoning Defense Department Misconduct**

The President has compromised the national security of the United States by permitting the Secretary of Defense, Pete Hegseth, to repeatedly violate elementary security procedures through his use of unsecure communications equipment and procedures (including sharing sensitive intelligence with family members and friends),<sup>87</sup> by directing and authorizing the Secretary to dismantle the nation's critical intelligence programs, replace experienced and qualified leaders of those programs and the country's military branches with inexperienced and less qualified personnel based on the President's or the Secretary's personal friendships<sup>88</sup> and by permitting the Secretary to undermine military preparedness and morale by discriminatory firings and other actions against senior officers and military personnel (particularly Black, female and gay officers), all in violation of his duties as Commander-in-Chief of the nation's military forces to protect and defend the United States.<sup>89</sup>

## **C. Abandoning International Institutions and Programs**

The President has, with the cooperation of the Secretary of State Marco Rubio, withdrawn funding for essential international institutions, agreements and programs that the United States helped establish and that protect our nation's security, the public health of our citizens and the global environment on which our nation and others depend. After improperly consolidating the USAID into his own Department, Mr. Rubio has, as part of this agency-wide funding cutback, withheld substantially all of the \$4.9 billion appropriated by Congress for essential nutrition and disease prevention programs globally. Recognizing that these Congressionally-appropriated funds cannot simply be ignored while food and medicine rots on docks, the President and Secretary have announced that the appropriated funds are no longer available to it, a clear violation of the purpose of the USAID commitment, on behalf of the American people, to help reduce disease and hunger in the developing world.<sup>90</sup> As a result of all

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<sup>86</sup> Santul Nerkar, Annie Correal & Colin Moynihan, *The Ex-President Whom Trump Plans to Pardon Flooded America with Cocaine*, N.Y. TIMES (Nov. 29, 2025), <https://www.nytimes.com/2025/11/29/nyregion/honduras-hernandez-drug-trafficking.html>.

<sup>87</sup> Barak Ravid et al., *How Trump's Team Could've Planned the Houthis Strikes Without Signal*, AXIOS (Mar. 27, 2025), <https://www.axios.com/2025/03/27/why-hegseth-trump-use-signal-not-secure-comms>.

<sup>88</sup> Greg Jaffe, Eric Schmitt & Helene Cooper, *Hegseth is Purging Military Leaders with Little Explanation*, N.Y. TIMES (Nov. 7, 2025), <https://www.nytimes.com/2025/11/07/us/politics/hegseth-firing-military-leaders.html>; Tara Copp, *Hegseth's Younger Brother is Serving in a Key Role as Liaison and Senior Adviser Inside the Pentagon*, AP NEWS (Mar. 28, 2025), <https://apnews.com/article/hegseth-brother-signal-dhs-hired-68678a8a653c79a4c6ae31a8bee64836>.

<sup>89</sup> Helene Cooper, *Hegseth Orders 20 Percent Cut in Four-Star Officers*, N.Y. TIMES (May 5, 2025), <https://www.nytimes.com/2025/05/05/us/politics/pete-hegseth-military-cuts.html>; Gabe Whisnant, *Pentagon Issues New Sweeping Order Amid Trump Admin Crackdown on DEI*, NEWSWEEK (May 9, 2025), <https://www.newsweek.com/hegseth-pentagon-dei-books-us-military-libraries-2070469>.

<sup>90</sup> The President proposed the rescission of USAID's \$4.9 billion appropriation less than 45 days before the end of the September 30 fiscal year so that, under the Non-Impoundment Act, the appropriated funds would be suspended

of these defunding actions, one reliable study estimates that more than 640,000 people (including 438,000 children) are likely to die from malaria, pneumonia, HIV, diarrhea, tuberculosis, malnutrition and tropical diseases.<sup>91</sup>

#### **D. Banning Foreign Visitors**

On June 4, 2025 the President announced that he had imposed a complete ban on foreign visitors from 12 nations (Afghanistan, Burma (Myanmar), Chad, Republic of the Congo, Equatorial Guinea, Eritrea, Haiti, Iran, Libya, Somalia, Sudan and Yemen) and a partial ban on visitors from seven other nations (Burundi, Cuba, Laos, Sierra Leone, Togo, Turkmenistan and Venezuela). On June 16, 2025, the President added another 36 countries, again overwhelmingly from Africa to the list of nations from which no immigration will be permitted. These unilateral actions by the President to ban all visitors from largely African and Islamic countries has led to a broad international perception that our nation is now conducting an overtly racial immigration policy, a policy that is inconsistent with American values and can only help isolate our nation from an increasingly diverse global economy and culture. This perception has been increased by the reported Presidential intention to substantially reduce the number of immigrants lawfully permitted to enter the country and to favor white residents of South Africa in allocating that reduced number of immigrant visas. These actions came on top of an earlier ban that the President had issued (and then temporarily paused for several months) barring all foreign students from U.S. colleges and universities, unilateral Presidential action that undermines long-standing U.S. policy to help educate the world's future leaders in business, science, culture and government.<sup>92</sup>

### **VI. USING THE PRESIDENCY TO ENRICH HIMSELF AND HIS FAMILY**

**The President has abused and betrayed the trust of the American people by flagrantly using the Presidency to enrich himself and his family. The President has found and cultivated avenues, both at home and abroad, to exploit for his personal financial advantage the powers invested in him to conduct our nation's foreign affairs, to shape regulatory priorities by the executive branch and to issue pardons.<sup>93</sup> To that end, the President has improperly exploited and corrupted his office by, among other things:**

#### **A. Supporting Crypto Market**

The President has publicly promoted and established within the United States government a federal depository for "crypto" coins at a time when the President's immediate

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for 45 days (unless Congress acts during that period), permitting the fiscal year to run out while the funds were not available.

<sup>91</sup> Amy Schoenfeld Walker, Malika Khurana & Christine Zhang, *What Remains of U.S.A.I.D.*, N.Y. TIMES (June 22, 2025), <https://www.nytimes.com/interactive/2025/06/22/us/politics/usaid-foreign-aid-trump.html>.

<sup>92</sup> Zolan Kanno-Youngs & Hamed Aleaziz, *Trump Cuts Refugee Admissions and Prioritizes White South Africans*, N.Y. TIMES (Oct. 30, 2025), <https://www.nytimes.com/2025/10/30/us/politics/trump-refugee-admissions-white-south-africans.html>.

<sup>93</sup> See generally, David D. Kirkpatrick, *How Much Is Trump Pocketing Off the Presidency*, THE NEW YORKER (Aug. 11, 2025), <https://www.newyorker.com/magazine/2025/08/18/the-number>.

family members, and possibly the President himself, had substantial investments in such coins and were substantial, and intended, beneficiaries of the President's action to help create and sustain a valuable market for that private form of "currency."<sup>94</sup>

### **B. Selling Personal Memecoins in Exchange for Private White House Visits**

The President has advertised and offered exclusive dinners at his Mar-A-Lago club (where the podium included the Presidential seal) and exclusive guided tours of the White House for the largest purchasers of the President's family's brand of memecoin, \$Trump, with proceeds from those purchases accruing directly or indirectly to the President's immediate family.<sup>95</sup>

### **C. Launching Family Business Ventures with Foreign Governments**

The President or his immediate family have entered into personal business ventures with foreign entities owned or controlled by the governments of Saudi Arabia, Qatar, Oman and Vietnam at the same time that the President was negotiating with those governments over tariffs and other matters of national and international importance. By way of example, in May 2025 the President approved (and personally attended a groundbreaking for) a massive new artificial intelligence campus in the United Arab Emirates (UAE) utilizing the most advanced advance U.S. chips, which are normally subject to strict export controls to prevent their use by (or transfer to) China and others. Two weeks earlier, it was later learned, a member of the UAE President's royal family had deposited \$2 billion into the World Liberty Financial cryptocurrency firm created by the Trump family and the family of the President's special Middle East envoy, Stephen Witkoff, who had negotiated that payment shortly before the AI campus agreement (and chip export license) was approved by the President.<sup>96</sup>

### **D. Accepting Gift Airplane from Qatar**

The President has directed the Department of Defense to accept, without Congressional consent and in violation of the Emoluments Clause of the Constitution, the gift of a 747 Boeing Aircraft from the government of Qatar for the President's personal use while President and for the benefit of a foundation that he intends to establish at the end of his current term.<sup>97</sup>

### **E. Selling Presidential Pardons and Regulatory Favors**

The President has grossly abused his pardon power under the Constitution by effectively selling use of that power to grant pardons for federal crimes to a number of donors who contributed either to the President's inaugural committee or directly to him, his immediate family or entities they own or control.<sup>98</sup> Other individuals and companies, including the owners of the

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<sup>94</sup> *Id.*

<sup>95</sup> *Id.*

<sup>96</sup> *Id.*

<sup>97</sup> *Id.*

<sup>98</sup> Peter Stone, 'A Classic Authoritarian Tactic': *Outrage Over Trump's Pardons for Friends and Allies*, THE GUARDIAN (Nov. 11, 2025), <https://www.theguardian.com/us-news/2025/nov/11/trump-pardons-justice-department>.

Los Angeles Times, WABC, Paramount and YouTube have made large contributions to the President or his family in the form of a purported book advance of approximately \$29 million to the President's wife or settlement of baseless lawsuits brought by the President in order to secure favorable regulatory action on pending or contemplated corporate plans. Still others contributed either to the President's inaugural committee, to the President's super PAC, to his birthday military parade or to one or more of his crypto funds in exchange for anticipated (and later granted) favorable action on investigations or enforcement proceedings by the Securities and Exchange Commission.<sup>99</sup>

#### **F. Selling Presidential and Regulatory Access through Private Club Memberships**

The President's immediate family members have, with the President's encouragement, established a members-only club in Washington D.C. for the purpose of attracting wealthy members willing to pay high amounts to curry favor with the President and his senior appointees, including the Attorney General, the Secretary of State and other cabinet members, who are encouraged by the President to be accessible to club members in their business or personal concerns.<sup>100</sup>

#### **G. Selling Consumer Products through the Presidency**

The President has used the White House and his Presidency to publicly market clothing, mementos, bibles, watches and other products that contain his name and likeness in a manner that both demeans the Office of President and provides personal profits to the President and his family.<sup>101</sup>

Although it is not possible at this time to calculate the profits to the President and his family from these and similar transactions, one detailed analysis has conservatively estimated their *present value* to be at least \$3.4 billion. Regardless of the precise amount, many of these transactions by the President and his family violate the spirit and likely the letter of the Emoluments Clause of the Constitution, while others can reasonably be seen as payments in exchange for favorable governmental action (in the form of agency approvals, tariffs adjustments or pardons) by the President or his appointees.<sup>102</sup>

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<sup>99</sup> Saurav Ghosh & Maha Quadri, *The Impact of Big Money and Secret Spending on Trump's Second Inauguration*, CAMPAIGN LEGAL CTR. (May 22, 2025), <https://campaignlegal.org/update/impact-big-money-and-secret-spending-trumps-second-inauguration>. For a running list of President Trump's pardons, see *The Morning Dispatch: President Trump Pardon Database*, THE DISPATCH, available at [https://docs.google.com/spreadsheets/d/1xqTMeqCIRl4tcJrEljbdJkKBI-uy\\_Kl4Cg6hXcFBQWw/edit?gid=0#gid=0](https://docs.google.com/spreadsheets/d/1xqTMeqCIRl4tcJrEljbdJkKBI-uy_Kl4Cg6hXcFBQWw/edit?gid=0#gid=0).

<sup>100</sup> *Supra* note 93.

<sup>101</sup> David D. Kilpatrick, *How Much Is Trump Pocketing Off the Presidency*, THE NEW YORKER (Aug. 22, 2025), <https://www.newyorker.com/magazine/2025/08/18/the-number>.

<sup>102</sup> *Supra* note 93.

## REMEDIES FOR ABUSES OF PRESIDENTIAL POWER AND EXECUTIVE OVERREACH

We believe that the conduct summarized above reflects a sustained pattern of egregious abuse of presidential power and a profound betrayal of the public trust. Taken as a whole, the President's actions—and those of his senior appointees—amount to widespread violations of law, misuse of the powers delegated to the Executive under the Constitution, and a grave and continuing breach of the obligations owed to the American people. That some discrete actions may not, standing alone, violate the Constitution or federal statutes does not alter the pervasive pattern of misconduct.<sup>103</sup>

What distinguishes the conduct described in this Report is its cumulative effect. When considered together, the staggering breadth and escalating nature of the President and his Administration's actions reveal a sweeping misuse of the powers of the office: deploying armed forces domestically for political ends; undermining the fundamental rights of citizens and non-citizens; weakening Congressionally mandated programs essential to public health, safety, and economic security; attacking the independence of the judiciary and misusing the Department of Justice to target perceived political adversaries; disregarding constitutional and international limits on the use of military force; abandoning essential international commitments; and exploiting the Presidency for substantial personal and familial financial gain. Taken as a whole, the course of conduct documented here violates the President's oath to defend the Constitution and to faithfully execute the laws.

The Constitution entrusts members of Congress with several tools to address serious abuses of presidential power. There is the option of formal censure; investigations, including those conducted by a special counsel, can expose wrongdoing; and conditioning or restricting appropriations can constrain certain policies. The Twenty-Fifth Amendment provides a mechanism to address incapacity, though that mechanism focuses on a President's disability rather than abuse of power and depends on Executive Branch, not Congressional, action for its commencement. And informal pressure that Congress can exert through their access to government officials and the media can help to inform and garner support, both within the government and from the public, against presidential abuses and executive overreach. Each of these tools has an important role in our constitutional structure, though we seriously question whether they are adequate, either alone or in combination, to respond to the breadth and escalating scale of the abuse of presidential power and betrayal of the public trust detailed here.

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<sup>103</sup> In assessing this pattern, it is also important to identify what this Report does not address. We have not treated as abuses of power the President's coarse personal attacks on political opponents or his demeaning remarks about racial and minority groups; the discriminatory actions of some appointees against women, LGBTQ individuals, or people with disabilities; nor the Administration's efforts to sanitize libraries, museums, textbooks, and even the White House itself of the contributions and histories of minority communities. Nor have we treated the President's denial of climate science or other policy choices—however misguided or harmful—as misconduct or abuses of power, because the appropriate remedies for such choices lie with the electorate at the ballot box. The same is true with respect to several foreign-policy decisions. The President's abrupt shift away from the United States' long-standing opposition to Russian aggression in Ukraine, his inflammatory rhetoric about invading friendly nations, his revocation of temporary protected status for certain immigrant groups, and his praise of autocratic leaders for repressive practices are all troubling departures from established norms. Rather than misconduct or abuses of power, however, such choices are best addressed by the Congress or by the electorate exercising their democratic right to vote.

There is, of course, another remedy that the Framers provided to Congress for precisely this purpose: impeachment.<sup>104</sup> It has long been understood that impeachment does not require proof of a statutory crime. “High Crimes and Misdemeanors” refers to serious abuses of official power and betrayals of the public trust that endanger the constitutional order, whether or not they are criminally prosecutable. Indeed, because the Supreme Court has held that Presidents are immune from civil and criminal liability for actions taken within the core of their constitutional authority and because the President has broad pardon authority, impeachment is the primary mechanism by which a sitting President (or the President’s principal agents) may be held accountable for such abuses while in office. The question in any impeachment inquiry, therefore, is not whether the President (or his agents) violated a particular statute, but whether his conduct reflects a grave abuse of power or a significant breach of the trust placed in him by the people.

The Constitution does not authorize us, or any private body, to invoke the sanction of impeachment or any other legislative remedy for Presidential abuse. That responsibility rests with Congress, which can, and should, use its Constitutional powers to curtail the ongoing and expanding abuses of Presidential authority described in this report. In our judgment, the pattern of Presidential conduct described in this report fits squarely within the Constitutional standard for impeachment. It is time for Congress to exercise all available mechanisms to protect our democracy.

At the Constitutional Convention of 1787, when Benjamin Franklin was asked whether our nation would have a republic or a monarchy, he famously responded “A republic if you can keep it.” More than fifty years ago, a newly elected Governor of California echoed that sentiment, reminding the public that freedom “is not ours by way of inheritance; it must be fought for and defended constantly by each generation.”<sup>105</sup> Our Constitution entrusts that defense to all of us, but especially to those elected to Congress to serve as guardians of our constitutional order. The conduct described in this Report requires Congress to meet that responsibility and to take effective action, as provided in the Constitution, to remedy the President’s gross abuse of office and betrayal of public trust. Only by taking action can Congress restore adherence to the rule of law and the principles needed to keep our Republic.

Updated December 23, 2025

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<sup>104</sup> This standard and the historical basis for impeachable conduct are fully discussed in works by prominent legal scholars Professor Cass R. Sunstein of Harvard Law School and Professor Akhil Reed Amar of Yale Law School. CASS R. SUNSTEIN, *IMPEACHMENT: A CITIZEN’S GUIDE* (2017), available at <https://lccn.loc.gov/2017034532>; Akhil Reed Amar, *On Impeaching Presidents*, 28 HOFSTRA L. REV. 291, 291–341 (1999), available at <https://scholarlycommons.law.hofstra.edu/hlr/vol28/iss2/1>.

<sup>105</sup> Ronald Reagan, Inaugural Address as Governor of California (Jan. 5, 1967), available at <https://www.reaganlibrary.gov/archives/speech/january-5-1967-inaugural-address-public-ceremony>.