

119TH CONGRESS 1ST SESSION

H. RES.

353

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

IN THE HOUSE OF REPRESENTATIVES

Mr. Thanedar submitted the following resolution; which was referred to the Committee on

RESOLUTION

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

- 1 Resolved, That Donald John Trump, President of the
- 2 United States, is impeached for high crimes and mis-
- 3 demeanors, and that the following articles of impeachment
- 4 be exhibited to the Senate:
- 5 Article of impeachment exhibited by the House of
- 6 Representatives of the United States of America in the
- 7 name of itself and of the people of the United States of
- 8 America, against Donald John Trump, President of the
- 9 United States of America, in maintenance and support of

- 1 its impeachment against him for high crimes and mis-
- 2 demeanors.
- 3 ARTICLE I: OBSTRUCTION OF JUSTICE, VIOLATION OF
- 4 DUE PROCESS, AND A BREACH OF THE DUTY TO
- 5 FAITHFULLY EXECUTE LAWS
- 6 The Constitution provides that the House of Rep-
- 7 resentatives "shall have the sole Power of Impeachment"
- 8 and that the President "shall be removed from Office on
- 9 Impeachment for, and Conviction of, Treason, Bribery, or
- 10 other high Crimes and Misdemeanors". Further, Article
- 11 II of the Constitution states that the President "shall take
- 12 Care that the Laws be faithfully executed", the Fourth
- 13 Amendment of the Constitution states that "The right of
- 14 the people . . . against unreasonable searches and sei-
- 15 zures, shall not be violated", and the Fifth Amendment
- 16 of the Constitution states "No person shall be . . . de-
- 17 prived of life, liberty, or property, without due process of
- 18 law". In his conduct of the office of President of the
- 19 United States—and in violation of his constitutional oath
- 20 to faithfully to execute the office of President of the
- 21 United States and, to the best of his ability, preserve, pro-
- 22 tect, and defend the Constitution of the United States,
- 23 and in violation of his constitutional duty to take care that
- 24 the laws be faithfully executed—Donald John Trump has
- 25 abused the powers of the Presidency in a manner offensive
- 26 to, and subversive of, the Constitution, in that:

1	Using the power of his high office, Donald John
2	Trump has engaged in this scheme or course of conduct
3	through the following means:
4	(1) By his orders and directions to subordi-
5	nates, obstructed the administration of justice and
6	embarked on a scheme to destroy and corrupt the
7	legal system and the powers of the courts under Ar-
8	ticle III of the Constitution. Specifically, he has done
9	the following:
10	(A) Directed and permitted his subordi-
11	nates and attorneys at the Department of Jus-
12	tice to violate their oaths to uphold the Con-
13	stitution, laws of the United States, and the
14	rules of professional ethics by adducing mis-
15	leading and willfully false representations to the
16	courts of the United States, and to otherwise
17	abuse their official powers. Specifically, he
18	has—
19	(i) sought to dismiss, without preju-
20	dice and under false pretenses, the bribery
21	and fraud charges against New York City
22	Mayor Eric Adams, in an unethical quid
23	pro quo exchange for the Defendant's co-
24	operation with the Administration's polit-
25	ical priorities, thus abusing the criminal

1	laws to unconstitutionally commandeer a
2	State officer and unit of government in
3	violation of the sovereignty thereof; and
4	(ii) terminated and purged career De-
5	partment of Justice attorneys without rea-
6	sonable cause and in violation of the law in
7	retaliation for their legitimate investigatory
8	and prosecutorial work under prior admin-
9	istrations, including in relation to the Jan-
10	uary 6, 2021, attack on the United States
11	Capitol, and in retaliation for attorneys
12	upholding their ethical and legal obliga-
13	tions including candor and honesty to the
14	courts.
15	(B) Directed and permitted the evasion
16	and defiance of binding court orders. Specifi-
17	cally, he has—
18	(i) removed persons from the United
19	States to El Salvador despite an order
20	from the United States District Court for
21	the District of Columbia, for which said
22	Court has found probable cause that the
23	Government committed acts of criminal
24	contempt;

1	(ii) removed Kilmar Armando Abrego
2	Garcia from the United States to El Sal-
3	vador despite a binding Withholding of Re-
4	moval order prohibiting the government
5	from removing him to El Salvador;
6	(iii) defied court orders, upheld by a
7	unanimous ruling of the Supreme Court, to
8	facilitate the release of Mr. Abrego Garcia,
9	and related orders to provide information
10	to the court and opposing counsel, while
11	publicly flaunting their refusal;
12	(iv) acted in contempt of court for vio-
13	lating a court-sanctioned settlement agree-
14	ment; and
15	(v) conducted enforced disappearances
16	of persons without due process and without
17	disclosing their fate and location to their
18	families and legal counsel, in violation of
19	the Constitution and the rulings of the Su-
20	preme Court, as well as the foundational
21	principles of due process and the rule of
22	law.
23	(C) Directed and permitted the deliberate
24	and systematic violation of laws duly enacted by
25	Congress. Specifically, he has—

1	(i) terminated Inspector Generals, the
2	officers responsible for detecting and pre-
3	venting waste by auditing and inves-
4	tigating their respective agencies' oper-
5	ations and personnel, in violation of the
6	process stipulated by the Inspector Gen-
7	erals Act of 1974, as subsequently amend-
8	ed;
9	(ii) terminated a member of the Merit
10	Systems Protection Board, a tribunal cre-
11	ated to address widespread public concerns
12	about the Federal civil service; and
13	(iii) unlawfully transmitted sensitive
14	personal information of private citizens
15	and government employees in violation of,
16	among other Federal laws, the Privacy Act
17	and the Administrative Procedure Act.
18	In all of this, Donald John Trump has willfully dis-
19	regarded Federal laws and the Constitution, imperiled a
20	coequal branch of Government, and threatened the integ-
21	rity of the democratic system. He thereby betrayed his
22	trust as President, abused the powers of the Presidency,
23	acted in a manner grossly incompatible with self-govern-
24	ance and the rule of law, and has committed the High
25	Crimes and Misdemeanors of obstruction of justice and

- 1 effecting a wide-ranging scheme to destroy and corrupt
- 2 the legal system and the powers of the courts under Article
- 3 III of the Constitution.
- 4 Wherefore, Donald John Trump, by such conduct,
- 5 has demonstrated that he is unfit to govern a Nation by
- 6 and for the people, has acted in a manner grossly incom-
- 7 patible with self-governance and the rule of law, and will
- 8 remain a threat to the Constitution if allowed to remain
- 9 in office.
- 10 ARTICLE II: USURPATION OF THE APPROPRIATIONS
- 11 POWER
- The Constitution provides that the House of Rep-
- 13 resentatives "shall have the sole Power of Impeachment"
- 14 and that the President "shall be removed from Office on
- 15 Impeachment for, and Conviction of, Treason, Bribery, or
- 16 other high Crimes and Misdemeanors". Further, Section
- 17 9 of Article I of the Constitution states that "No money
- 18 shall be drawn from the Treasury, but in Consequence of
- 19 Appropriations made by Law". In his conduct of the office
- 20 of President of the United States—and in violation of his
- 21 constitutional oath to faithfully to execute the office of
- 22 President of the United States and, to the best of his abil-
- 23 ity, preserve, protect, and defend the Constitution of the
- 24 United States, and in violation of his constitutional duty
- 25 to take care that the laws be faithfully executed—Donald
- 26 John Trump has abused the powers of the Presidency in

a manner offensive to, and subversive of, the Constitution, 2 in that: 3 Using the powers of his high office, Donald John Trump unlawfully usurped Congress and its power to appropriate funds, thereby nullifying the Appropriations 6 Clause in the Constitution and violating the Impoundment Control Act of 1974. Since taking office, he has signed 8 numerous Executive Orders directing agencies to withhold funds appropriated by Congress. The President does not have the power to override spending laws or impound ap-10 propriated funds, a principle affirmed by numerous Supreme Court rulings. 12 13 Donald John Trump has withheld funds and termi-14 nated en masse Federal employees and numerous Federal 15 agencies and departments, including the following: 16 (1) Directed the dismantling of the Department 17 of Education. As enacted in the Department of Edu-18 cation Organization Act, signed into law by Presi-19 dent Jimmy Carter, the Department of Education 20 was established by Congress to create reform in the 21 education system throughout the country, distribute 22 Federal aid to students and places of learning, and 23 prohibit discriminatory practices. The President does 24 not have the authority to dismantle the Department 25 of Education, and his signing of Executive Order 1 14242, which aims to "Improving Education Out-2 comes by Empowering Parents, States, and Commu-3 nities", violates the law and the Constitution.

(2) Unlawfully directed the elimination of the United States Agency for International Development (USAID). As enacted in the Foreign Assistance Act of 1961, signed into law by President John F. Kennedy, USAID plays a crucial role in delivering foreign assistance worldwide, including disaster relief, conflict relief, combating global diseases, promoting educational programs, and enhancing food security in developing countries. By dismantling USAID and freezing foreign assistance, he has severed the United States from its humanitarian role as directed by Congress, leaving other countries and potentially our adversaries to fill in the role the United States has abandoned.

(3) Created the so-called "Department of Government Efficiency (DOGE)", which has imposed payment holds and rescinded funds after disbursement. Donald John Trump has utilized DOGE to unlawfully block or impound appropriated funds to dozens of Federal agencies, including the National Institutes of Health, the Federal Aviation Administration, and the Department of Veterans Affairs. By

1	impounding congressionally appropriated funds
2	Donald John Trump and DOGE have not only vio-
3	lated the law, but have negatively impacted the
4	American people by cutting jobs, halting critical
5	services, and rescinding grants for programs, in defi-
6	ance of the express, constitutionally binding will of
7	Congress.
8	Using the powers of his high office, Donald John
9	Trump has unlawfully withheld congressionally appro-
10	priated funds and attempted to dismantle congressionally
11	mandated agencies. By withholding funds and crippling
12	agencies, he has prevented the Federal Government from
13	performing critical duties here and abroad. He has threat-
14	ened the well-being of United States citizens through the
15	gross misconduct of his office, resulting in dire and life-
16	threatening consequences on the world's most vulnerable
17	populations.
18	Wherefore, Donald John Trump, by such conduct,
19	has demonstrated that he is unfit to govern a Nation by
20	and for the people, has acted in a manner grossly incom-
21	patible with self-governance and the rule of law, and will
22	remain a threat to the Constitution if allowed to remain
23	in office.

1	ARTICLE III: ABUSE OF TRADE POWERS AND
2	INTERNATIONAL AGGRESSION
3	The Constitution provides that the House of Rep-
4	resentatives "shall have the sole Power of Impeachment"
5	and that the President "shall be removed from Office on
6	Impeachment for, and Conviction of, Treason, Bribery, or
7	other high Crimes and Misdemeanors". Further, Section
8	8 of Article I of the Constitution states, "Congress shall
9	have Power To lay and collect Taxes, Duties, Imposts and
10	Excises, but all Duties, Imposts and Excises shall be
11	uniform throughout the United States". In his conduct of
12	the office of President of the United States—and in viola-
13	tion of his constitutional oath to faithfully to execute the
14	office of President of the United States and, to the best
15	of his ability, preserve, protect, and defend the Constitu-
16	tion of the United States, and in violation of his constitu-
17	tional duty to take care that the laws be faithfully exe-
18	cuted—Donald John Trump has abused the powers of the
19	Presidency in a manner offensive to, and subversive of,
20	the Constitution, in that:
21	Using the powers of his high office, Donald John
22	Trump abused trade powers by imposing unjustifiable and
23	unreasonable tariffs on foreign nations, causing a sharp
24	decline in the United States economy and the economies
25	of countries around the world, and declaring the false ex-

- 1 istence of a national security emergency to justify his ac-
- 2 tions. Donald John Trump's tariffs contradicted trade
- 3 agreements established by his Administration and other
- 4 administrations, including the duly ratified and binding
- 5 treaty obligations of the United States, thereby breaking
- 6 international laws and norms, leading to countries around
- 7 the world to enact damaging tariffs on goods and services
- 8 originating from the United States. His "Liberation Day"
- 9 scheme, which imposed 10 percent tariffs on all countries,
- 10 as well as additional tariffs based on a formula for "reci-
- 11 procity" widely mocked as nonsensical, led to the most sig-
- 12 nificant drop in the financial markets since the 2020 crash
- 13 triggered by the COVID-19 pandemic.
- 14 Additionally, Donald John Trump has threatened for-
- 15 eign nations with invasion, the annexation of territory,
- 16 and the occupation of sovereign territory through the use
- 17 of military action. By doing this, he has implicated the
- 18 United States and himself in violation of constitutionally
- 19 binding treaty obligations, to include the North Atlantic
- 20 Treaty of 1949, the General Treaty for Renunciation of
- 21 War as an Instrument of National Policy of 1928, the
- 22 Charter of the United Nations of 1945, and the Inter-
- 23 American Treaty of Reciprocal Assistance of 1947. Don-
- 24 ald John Trump threatened the following:

1	(1) Annexation of the sovereign country of Can-
2	ada. Donald John Trump has negatively impacted
3	the deep and historic relationship between the
4	United States and Canada by stating numerous
5	times that Canada should become the 51st State,
6	under the threat of both economic coercion and mili-
7	tary force.
8	(2) Unlawful and aggressive military action
9	within Mexico, to include drone strikes and the use
10	of special operations military personnel, ostensibly
11	against drug cartels, in violation of the sovereignty
12	and territorial integrity of that country and without
13	any congressional authorization to use military force.
14	(3) Annexation of Greenland, an autonomous
15	territory in the Kingdom of Denmark. Donald John
16	Trump has continued to use hostile language aimed
17	at taking control of Greenland, stating that the
18	United States will "go as far as we have to go" to
19	obtain control of Greenland. He has refused to rule
20	out military action to gain control of the territory,
21	in violation of international law and despite Den-
22	mark's longstanding alliance and friendly relations
23	with the United States.
24	(4) Annexation of the Panama Canal, owned
25	and controlled by Panama. During a joint session

- speech to Congress, Donald John Trump stated that his Administration "will be reclaiming the Panama Canal". He has refused to rule out military or economic action against the sovereign country. 5 Annexation of the Gaza Strip, involving the
- 6 forced resettlement of the Palestinian population to 7 the surrounding countries. Donald John Trump has 8 stated that the United States "will take over the 9 Gaza Strip" and "own it". His proposal of taking 10 over the Gaza Strip and the expulsion of its popu-11 lation violates international law, including the Con-12 vention on the Prevention and Punishment of the Crime of Genocide, would be unconstitutional absent 13 14 the approval of the United States Congress, and is 15 profoundly unserious in light of the grave humani-16 tarian situation and ongoing armed conflict in Gaza. 17 Using the powers of his high office, Donald John 18 Trump has unlawfully conducted himself, bringing shame 19 and embarrassment to the office of the Presidency and 20 the people of the United States. He has betrayed the trust 21 of the Nation to conduct meaningful diplomatic negotia-22 tions as its chief diplomat and failed to maintain peaceful 23 economic and defense relations with foreign countries. He has threatened the security of the United States through gross misconduct of his office, prompting hostilities to-

- 1 wards Americans here and abroad, as well as foreign na-
- 2 tions warning their citizens against visiting the United
- 3 States, further harming the Nation's economy.
- 4 Wherefore, Donald John Trump, by such conduct,
- 5 has demonstrated that he is unfit to govern a Nation by
- 6 and for the people, has acted in a manner grossly incom-
- 7 patible with self-governance and the rule of law, and will
- 8 remain a threat to the Constitution if allowed to remain
- 9 in office.
- 10 ARTICLE IV: VIOLATION OF FIRST AMENDMENT RIGHTS
- The Constitution provides that the House of Rep-
- 12 resentatives "shall have the sole Power of Impeachment"
- 13 and that the President "shall be removed from Office on
- 14 Impeachment for, and Conviction of, Treason, Bribery, or
- 15 other high Crimes and Misdemeanors". Further, the First
- 16 Amendment of the Constitution states "Congress shall
- 17 make no law respecting an establishment of religion, or
- 18 prohibiting the free exercise thereof; or abridging the free-
- 19 dom of speech, or of the press; or the right of the people
- 20 peaceably to assemble, and to petition the Government for
- 21 a redress of grievances". In his conduct of the office of
- 22 President of the United States—and in violation of his
- 23 constitutional oath to faithfully to execute the office of
- 24 President of the United States and, to the best of his abil-
- 25 ity, preserve, protect, and defend the Constitution of the
- 26 United States, and in violation of his constitutional duty

- 1 to take care that the laws be faithfully executed—Donald
- 2 John Trump has abused the powers of the Presidency in
- 3 a manner offensive to, and subversive of, the Constitution,
- 4 in that:
- 5 By his orders and directions to subordinates, retali-
- 6 ated against law firms and attorneys who have advised or
- 7 represented, or been associated with those who advise or
- 8 represent, litigants who displease him, in violation of the
- 9 Constitution's prohibition on retaliation against individ-
- 10 uals for engaging in First Amendment-protected conduct,
- 11 including the right to petition the government for redress
- 12 of grievances. Specifically, he has, barred attorneys at cer-
- 13 tain law firms from access to Federal buildings, arbitrarily
- 14 revoked security clearances without a reasonable basis,
- 15 threatened to cancel Federal contracts with any entity en-
- 16 gaging the targeted attorneys and firms, and demanded
- 17 pro bono services from law firms in exchange for the dis-
- 18 continuation of the punitive executive orders.
- 19 Additionally, Donald John Trump has engaged in a
- 20 pattern of unconstitutional, unlawful, and corrupt retalia-
- 21 tion against critics and political opponents, a flagrant vio-
- 22 lation of constitutional rights protected by the First
- 23 Amendment. He has weaponized the Department of Jus-
- 24 tice and other agencies to engage in spurious investiga-

- 1 tions and harassment, with no basis in law, of public fig-
- 2 ures and his perceived political enemies.
- 3 Since taking office, Donald John Trump has directed
- 4 the Department of Justice to dismiss more than a dozen
- 5 prosecutors who were involved in investigations against
- 6 him after he left office in 2021. The Department of Jus-
- 7 tice has subsequently launched investigations into officials
- 8 involved in prior probes against Donald John Trump, in
- 9 some cases against individuals specifically named and ac-
- 10 cused in flagrantly improper executive orders.
- 11 Furthermore, he has made direct and unambiguous
- 12 public statements threatening media outlets, current and
- 13 former officeholders, and advocacy organizations. He has
- 14 pursued meritless litigation, leveraged his public office for
- 15 private gain, and perverted the course of justice and the
- 16 integrity of the judicial system to extract tens of millions
- 17 of dollars in putative settlements, effectively acting as a
- 18 conduit for flagrant bribery and extortion. He has re-
- 19 stricted the access of the Associated Press after they re-
- 20 fused to use the name "Gulf of America" in their report-
- 21 ing and has defied court orders to cease this unconstitu-
- 22 tional action. He has also threatened current and former
- 23 members of Congress for the exercise of their legislative
- 24 and oversight functions, an attack on the independence of
- 25 Congress as a coequal branch of government as estab-

- 1 lished by the Constitution's Article I Vesting Clause, and
- 2 by the Constitution's Speech or Debate Clause, in addition
- 3 to the First Amendment.
- 4 For example, Donald John Trump has repeatedly
- 5 threatened members of the House Select Committee on
- 6 the January 6th Attack on the United States Capitol,
- 7 which investigated the attack on the Capitol that Donald
- 8 John Trump instigated. Donald John Trump has sought
- 9 to intimidate the members and staff of the United States
- 10 House Select Committee on the January 6th Attack, stat-
- 11 ing that they "should fully understand that they are sub-
- 12 ject to investigation at the highest level" and expressing
- 13 a desire to remove the pardons they received, stating "The
- 14 'Pardons' that Sleepy Joe Biden gave to the Unselect
- 15 Committee of Political Thugs, and many others, are here-
- 16 by declared [void, vacant, and of no further force or ef-
- 17 fect]".
- Donald John Trump has made it clear that he will
- 19 not rest until all of his perceived political enemies are
- 20 eliminated. In a speech addressing his Department of Jus-
- 21 tice subordinates, Donald John Trump further laid out his
- 22 fascist vision for the Department of Justice. He has tar-
- 23 geted watchdog organizations like the Citizens for Respon-
- 24 sibility and Ethics in Washington, calling them "scum"
- 25 and independent media outlets like CNN and MSNBC, la-

- 1 belling them as organizations that "literally write 97.6"
- 2 percent bad about me, are political arms of the Democrat
- 3 Party. And in my opinion, they are really corrupt and they
- 4 are illegal. What they do is illegal.". He has stated that
- 5 newspapers critical of him are "really no different than
- 6 a highly paid political operative. And it has to stop. It
- 7 has to be illegal. It's influencing judges ... it just cannot
- 8 be legal.".
- 9 By these and many other actions, he has sought to
- 10 outlaw dissent, opposition, and criticism of himself and his
- 11 Administration. This attack on the constitutional rights
- 12 to freedom of speech, and of association, and of the right
- 13 to petition the government for redress of grievances, is
- 14 wholly incompatible with the rights and liberties of the
- 15 People of the United States as a self-governing people
- 16 under the rule of law.
- 17 In purpose and effect, he has attempted to suppress
- 18 dissent and opposition, casting a chilling effect over the
- 19 public discourse, and striking at the core freedoms essen-
- 20 tial to a free society and democratic elections under the
- 21 Constitution.
- Wherefore, Donald John Trump, by such conduct,
- 23 has demonstrated that he is unfit to govern a Nation by
- 24 and for the people, has acted in a manner grossly incom-
- 25 patible with self-governance and the rule of law, and will

- 1 remain a threat to the Constitution if allowed to remain
- 2 in office.
- 3 ARTICLE V: CREATION OF UNLAWFUL OFFICE
- 4 The Constitution provides that the House of Rep-
- 5 resentatives "shall have the sole Power of Impeachment"
- 6 and that the President "shall be removed from Office on
- 7 Impeachment for, and Conviction of, Treason, Bribery, or
- 8 other high Crimes and Misdemeanors". Further, Section
- 9 2 of Article II of the Constitution states that the President
- 10 "shall appoint Ambassadors, other public Ministers and
- 11 Consuls, Judges of the supreme Court, and all other Offi-
- 12 cers of the United States . . . but the Congress may by
- 13 Law vest the Appointment of such inferior Officers, as
- 14 they think proper, in the President alone, in the Courts
- 15 of Law, or in the Heads of Departments". In his conduct
- 16 of the office of President of the United States—and in
- 17 violation of his constitutional oath to faithfully to execute
- 18 the office of President of the United States and, to the
- 19 best of his ability, preserve, protect, and defend the Con-
- 20 stitution of the United States, and in violation of his con-
- 21 stitutional duty to take care that the laws be faithfully
- 22 executed—Donald John Trump has abused the powers of
- 23 the Presidency in a manner offensive to, and subversive
- 24 of, the Constitution, in that:
- Using the powers of his high office, Donald John
- 26 Trump has, through unlawful orders and directives, cre-

- 1 ated an unlawful office, the so-called Department of Gov-
- 2 ernment Efficiency ("DOGE"), and assigned an extensive
- 3 range of unlawful powers, effectively granting this fla-
- 4 grantly unconstitutional creation significant control over
- 5 the executive branch. Donald John Trump has appointed
- 6 Mr. Elon Musk as the de facto head of this contrived enti-
- 7 ty, which was not created or funded by any law, without
- 8 a formal title or office. These actions have been in direct
- 9 violation of the Constitution's requirement that principal
- 10 officers of the United States must be created by law and
- 11 their appointees confirmed by the Senate, and that inferior
- 12 offices must be created by law with their appointment
- 13 vested as Congress may determine.
- 14 Additionally, he has vested these powers in Mr. Musk
- 15 without complying with the constitutional requirement
- 16 that all officers of the United States be commissioned by
- 17 the President and swear an oath of office to support the
- 18 Constitution. Mr. Musk has been designated as a special
- 19 government employee of the White House Office, in viola-
- 20 tion of statutory authorization and restrictions on such
- 21 designations. This false claim has also been used to com-
- 22 mit violations of the ethics, disclosure, and conflict-of-in-
- 23 terest laws applicable to government officers and regular
- 24 employees.

1	Contrary to the Government's claims in court, Mr.
2	Musk has exercised de facto control over DOGE and,
3	through it, control over a wide range of Government de-
4	partments and agencies. This unmistakable reality has
5	been repeatedly and openly stated by the Trump Adminis-
6	tration, including by Donald John Trump's own address
7	to Congress on March 4, 2025. In this capacity, Mr. Musk
8	and his subordinates have undertaken numerous violations
9	of the Constitution and laws, including by—
10	(1) impoundment of funds appropriated by
11	Congress;
12	(2) violations of privacy and security laws with
13	respect to sensitive information systems, personally
14	identifiable information, and classified material; and
15	(3) termination of government employees under
16	false pretenses and in violation of civil service laws.
17	These actions have vastly exceeded the terms of the
18	formal executive orders purporting to create DOGE under
19	the direction of a "U.S. DOGE Service Administrator",
20	an office which remained vacant for several weeks, with
21	the Government's own attorneys claiming in court that the
22	official head of DOGE was unknown to them. Since that
23	time, a nominal Administrator has been named, despite
24	the repeated avowals from the President and his Adminis-
25	tration that Mr. Musk controls and directs DOGE, as con-

- 1 firmed by ample public reporting and Mr. Musk's own
- 2 statements.
- 3 Donald John Trump has abused the powers of his
- 4 high office and breached the public trust by establishing
- 5 the so-called Department of Government Efficiency and
- 6 unconstitutionally placing Mr. Musk in control of this enti-
- 7 ty, knowingly provided false testimony to the court regard-
- 8 ing the leadership of the said entity, and directing the un-
- 9 lawful entity to implement his agenda, in violation of the
- 10 Constitution's objective of establishing Justice and funda-
- 11 mental rules for how the executive branch of the United
- 12 States is to be structured and how persons may be ap-
- 13 pointed to public office.
- Wherefore, Donald John Trump, by such conduct,
- 15 has demonstrated that he is unfit to govern a Nation by
- 16 and for the people, has acted in a manner grossly incom-
- 17 patible with self-governance and the rule of law, and will
- 18 remain a threat to the Constitution if allowed to remain
- 19 in office.
- 20 ARTICLE VI: BRIBERY AND CORRUPTION
- The Constitution provides that the House of Rep-
- 22 resentatives "shall have the sole Power of Impeachment"
- 23 and that the President "shall be removed from Office on
- 24 Impeachment for, and Conviction of, Treason, Bribery, or
- 25 other high Crimes and Misdemeanors". Further, Section
- 26 9 of Article I of the Constitution states that "no Person

- 1 holding any Office of Profit or Trust under them, shall,
- 2 without the Consent of the Congress, accept of any
- 3 present, Emolument, Office, or Title, of any kind what-
- 4 ever, from any . . . foreign State". In his conduct of the
- 5 office of President of the United States—and in violation
- 6 of his constitutional oath to faithfully to execute the office
- 7 of President of the United States and, to the best of his
- 8 ability, preserve, protect, and defend the Constitution of
- 9 the United States, and in violation of his constitutional
- 10 duty to take care that the laws be faithfully executed—
- 11 Donald John Trump has abused the powers of the Presi-
- 12 dency in a manner offensive to, and subversive of, the Con-
- 13 stitution, in that:
- Donald John Trump has engaged in a pattern of un-
- 15 lawful corruption for the personal profit of himself and
- 16 his associates, soliciting and accepting bribes in exchange
- 17 for official actions, policy influence, and favorable treat-
- 18 ment from the Administration. In so doing, he has, beyond
- 19 a reasonable doubt, profiteered from public office on a
- 20 scale unprecedented in American history.
- 21 Donald John Trump has engaged in fraudulent con
- 22 artist schemes through "pump and dump" or "rug pull"
- 23 tactics for cryptocurrency tokens he has created, and at
- 24 the same time, enabled a direct conduit for bribes paid
- 25 to him in exchange for official actions.

- 1 Donald John Trump has also leveraged the threat of
- 2 hostile government action and the corresponding offer of
- 3 preferential treatment in order to extract large payments
- 4 in the form of settlements for meritless and vexatious liti-
- 5 gation he pursues in his personal capacity, thereby cor-
- 6 rupting both the executive branch and the judiciary. To
- 7 advance this end, Donald John Trump solicited and re-
- 8 ceived \$940,000,000 in pro bono services from prominent
- 9 law firms to help causes he personally supports.
- 10 Donald John Trump has refused to divest himself or
- 11 take any steps to prevent conflicts of interest in his sub-
- 12 stantial personal business ventures, creating another con-
- 13 duit for the payment of bribes.
- 14 Donald John Trump has permitted and encouraged
- 15 his subordinates to violate laws regarding ethics, disclo-
- 16 sures, and self-dealing, and through these actions, he has
- 17 enabled and encouraged corruption and graft by his rel-
- 18 atives, associates, and political allies.
- 19 Donald John Trump has, in these ways and others,
- 20 solicited payments from foreign governments for corrupt
- 21 purposes and in flagrant violation of the Constitution's
- 22 prohibition on foreign emoluments.
- Wherefore, Donald John Trump, by such conduct,
- 24 has demonstrated that he is unfit to govern a Nation by
- 25 and for the people, has acted in a manner grossly incom-

- 1 patible with self-governance and the rule of law, and will
- 2 remain a threat to the Constitution if allowed to remain
- 3 in office.
- 4 ARTICLE VII: TYRANNY
- 5 The Constitution provides that the House of Rep-
- 6 resentatives "shall have the sole Power of Impeachment"
- 7 and that the President "shall be removed from Office on
- 8 Impeachment for, and Conviction of, Treason, Bribery, or
- 9 other high Crimes and Misdemeanors". Further, the sys-
- 10 tem of checks and balances, as well as the separation of
- 11 powers, as defined in the Constitution, work to ensure that
- 12 the Office of the President does not become tyrannical.
- 13 In his conduct of the office of President of the United
- 14 States—and in violation of his constitutional oath to faith-
- 15 fully to execute the office of President of the United States
- 16 and, to the best of his ability, preserve, protect, and defend
- 17 the Constitution of the United States, and in violation of
- 18 his constitutional duty to take care that the laws be faith-
- 19 fully executed—Donald John Trump has abused the pow-
- 20 ers of the Presidency in a manner offensive to, and subver-
- 21 sive of, the Constitution, in that:
- He has, by his actions and statements, sought to es-
- 23 tablish himself as tyrant, dictator, and autocrat over the
- 24 People of the United States, usurping unto himself the
- 25 constitutional powers of Congress, the courts, and the

- 1 States, and powers illegitimate and beyond the scope of
- 2 lawful government altogether.
- 3 He has claimed for himself absolute and arbitrary
- 4 power, the ability to suspend laws at whim, and utterly
- 5 disregarded and betrayed his oath to faithfully execute the
- 6 office of President of the United States and to preserve,
- 7 protect, and defend the Constitution of the United States.
- 8 He has denied and violated the right of the People
- 9 of the United States to freedom of speech, and of assem-
- 10 bly, and to petition the government for redress of griev-
- 11 ances.
- He has denied and violated the right of the People
- 13 of the United States to due process of law and equal pro-
- 14 tection under the laws, to fair and impartial independent
- 15 courts, and to legal counsel.
- 16 He has sought to intimidate and coerce, by means
- 17 including the threat of unlawful prosecutions and by en-
- 18 couraging violence and threats of violence, the Representa-
- 19 tives and Senators in Congress.
- He has denied and violated the separation of powers
- 21 and the Constitution's system of checks and balances, ar-
- 22 rogating unto himself the legislative and judicial powers,
- 23 including the power of Congress to levy taxes, appropriate
- 24 public funds, direct the organization of officers and agen-
- 25 cies of the executive branch, and to make laws.

- 1 He has sought to intimidate, coerce, and extort the
- 2 officers of the several States, including those elected by
- 3 the People thereof, and thereby sought to commandeer the
- 4 several States, in violation of their sovereignty and the
- 5 system of federalism established by the Constitution of the
- 6 United States.
- 7 He has sought to abrogate the citizenship clause of
- 8 the 14th Amendment to the Constitution, by means in-
- 9 cluding the issuance of an executive order that directs ex-
- 10 ecutive departments and agencies to withhold citizenship
- 11 from certain classes of persons who are born within the
- 12 United States.
- He has repeatedly threatened and suggested that he
- 14 intends to violate the Presidential term limits established
- 15 by the 22d Amendment to the Constitution, and adopted
- 16 overtly monarchical aspirations and affectations, including
- 17 by invoking and endorsing theories that he is above the
- 18 law or that his personal will constitutes the law.
- 19 In all of this, Donald John Trump has willfully dis-
- 20 regarded Federal laws and the Constitution, imperiled a
- 21 coequal branch of Government, and threatened the integ-
- 22 rity of the democratic system. He thereby betrayed his
- 23 trust as President, abused the powers of the Presidency,
- 24 acted in a manner grossly incompatible with self-govern-
- 25 ance and the rule of law, and has committed High Crimes

- 1 and Misdemeanors in attempting to establish himself as
- 2 a lawless tyrant to the manifest injury of the people of
- 3 the United States.
- 4 Wherefore, Donald John Trump, by such conduct,
- 5 has demonstrated that he is unfit to govern a Nation by
- 6 and for the people, has acted in a manner grossly incom-
- 7 patible with self-governance and the rule of law, and will
- 8 remain a threat to the Constitution if allowed to remain
- 9 in office.