



February 3, 2025

The Hon. Chuck Grassley
135 Hart Senate Office Building
Washington, D.C. 20510

The Hon. Dick Durbin
711 Hart Senate Office Building
Washington, D.C. 20510

Dear Chairman Grassley and Ranking Member Durbin,

We write to express our deep concerns about FBI nominee Kash Patel's recently revealed financial relationship with the government of Qatar—and to encourage you to hold a public hearing to hear his explanation. We are both government ethics experts, and have spent our entire careers assessing conflicts of interest and Patel's apparent relationship with Qatar deserves far greater public scrutiny. As head of the FBI he will be able to enforce—or not enforce—a series of laws that could impact Qatar's and other foreign principals' ability to influence United States policymaking, including the Foreign Agents Registration Act ("FARA"). The public needs to know whether the person entrusted with the country's federal law enforcement is working in their interests—or in the interests of the Qatari government.

On Saturday, February 1—two days *after* Patel's committee confirmation hearing—the Office of Government Ethics ("OGE") made publicly available Patel's ethics papers,¹ revealing that Patel's "National Security, Defense, and Intelligence" consulting company did work for Qatar until November 2024.² Patel continued this relationship while serving as a national security advisor to

¹ Officials Individual Disclosures Search Collection, OGE website, <https://oge.gov/web/oge.nsf/Officials%20Individual%20Disclosures%20Search%20Collection?OpenForm> (OGE's financial disclosure database reveals that Patel's "Ethics Agreement" and "Nominee 278" public financial disclosure report had not been added to the OGE database for public access until February 1, 2025).

² Letter from Kashyap Patel to Jolene A. Lauria, Designated Agency Ethics Official, Department of Department (Jan. 28, 2025), at 5,

[https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/730D7A12BBF6654785258C240032196E/\\$FILE/Patel%20%20Kashyap%20%20finalEA.pdf](https://extapps2.oge.gov/201/Presiden.nsf/PAS+Index/730D7A12BBF6654785258C240032196E/$FILE/Patel%20%20Kashyap%20%20finalEA.pdf) ("Ethics Agreement");

Kash Patel, Office of Gov't Ethics Form 278e, Section 4 Line 4,

<https://www.documentcloud.org/documents/25509708-kash-patel-financial-disclosure/>. See also Bryan Metzger, *Trump FBI pick Kash Patel made more than \$2.6 million from consulting, paid speeches, and books last year*, Business Insider (Jan. 30, 2025),

now-President Trump during the 2024 campaign, and reported receiving business income from that consulting company, Trishul LLC, in the amount of \$2,114,251.³ On the form Patel does not commit to divest from or wind down the firm, but rather states that, “[m]y consulting business will be inactive during my appointment and all outstanding client fees will be fixed before I enter government service.”⁴ This arrangement at the very least raises questions about whether he plans to continue his relationship with Qatar as soon as he leaves the government.

Federal law often requires people working on policy for foreign governments to register as a foreign agent under FARA. Congress passed FARA to give the public the opportunity to know who is engaging in political activities on behalf of foreign governments, foreign political parties and other foreign principals, “so that their activities can be evaluated in light of their associations.”⁵ FARA requires “individuals doing political or advocacy work on behalf of foreign entities in the United States to register with the Department of Justice (“DOJ”) and to disclose their relationship, activities, receipts, and disbursements in support of their activities.”⁶

It appears neither Patel nor Trishul is registered under FARA for services provided to Qatar,⁷ leaving open the important question of exactly what Patel did for Qatar when he was serving as a national security advisor to President Trump during the 2024 election. This is precisely why Patel must explain this relationship. If confirmed as the head of the FBI, Patel will be responsible for law enforcement investigations into possible FARA violations. And he will be expected to carry out this duty faithfully and impartially. That includes, for example, building FARA cases like the case against two men with ties to Trump’s 2016 campaign who were charged with violating FARA in January 2024 because of work they did for the Qatari government.⁸

The OGE paperwork includes other information raising potentially serious conflicts of interest questions. For instance, Patel reported in his ethics paperwork that he provided consulting services through Trishul to Trump Media and Technology Group, Save America and Fix

<http://businessinsider.com/trump-fbi-director-kash-patel-financial-disclosure-2025-1> (An advance copy of Patel’s Nominee 278 was made available to Business Insider in advance of it being made publicly available by OGE).

³ Patel, Form 278e, Section 2 Line 3.

⁴ Patel, Form 278e, Section 3 Line 1.

⁵ Cong. Research Serv., *Foreign Agents Registration Act (FARA): An Overview* (Jan. 5, 2024),

<https://crsreports.congress.gov/product/pdf/IF/IF10499> (quoting from

U.S. Dep’t of Justice, *Report of the Attorney General to the Congress on the Administration of the Foreign Agents Registration Act* (June 2012)).

⁶ Cong. Research Serv., *Foreign Agents Registration Act (FARA): An Overview* (Jan. 5, 2024),

<https://crsreports.congress.gov/product/pdf/IF/IF10499>.

⁷ Foreign Agents Registration Act Database, Department of Justice website,

<https://efile.fara.gov/ords/fara/f?p=1235%3A10> (“Filings Full-Text Search” was conducted for registration information using the search terms “Kashyap Patel,” “Kash Patel” and “Trishul”. Search was last conducted on February 3, 2025.)

⁸ Devlin Barrett and Josh Dawsey, *Two Operatives Prepare to Admit to Foreign Lobbying Charges*, Wash. Post (Jan. 2, 2024), <https://www.washingtonpost.com/national-security/2024/01/02/fara-barry-bennett-douglas-watts-qatar/>.

Nevada.⁹ SEC filings for Trump Media show that Patel served as an independent contractor for which he received an annual payment of \$120,000.¹⁰ And new SEC filings show that Patel, who serves on the board of directors of Trump Media, was issued 25,946 shares of Trump Media stock on January 28.¹¹ His ethics paperwork has not yet been updated to disclose those shares, and he has not committed to divest those holdings.

These papers are notable in their own right. But because OGE failed to publicly release them before his confirmation hearing, the public was deprived of a chance to assess how Patel's relationship with Qatar affects his holding one of the nation's highest law enforcement offices. Patel needs to explain any payments he received from the government of Qatar and he must do so before your Committee votes on his nomination.

If there is a risk of foreign influence, we need to know now, before we hand over the keys to the country's federal law enforcement.

Sincerely,

/s/Norman Eisen

Ambassador Norman Eisen (ret.)
Executive Chair and Founder

/s/Virginia Canter

Virginia Canter
Chief Counsel for Ethics and Anticorruption

cc.: Senate Judiciary Committee

⁹ Patel, OGE Form 278e, Section 4 Lines 1-3.

¹⁰ Trump Media & Technology Grp. Corp., Amendment No. 3 to Form S-1 (June 17, 2024) https://www.sec.gov/Archives/edgar/data/1849635/000114036124030406/ny20026576x34_s1a.htm.

¹¹ Kashyap Patel c/o Trump Media & Technology Group Corp, SEC Form 4 (Statement of Changes in Beneficial Ownership) Jan. 30, 2025, <https://s3.amazonaws.com/sec.irpass.cc/2660/0001474506-25-000022.htm>; Elisabeth Buchwald and Clare Duffy, *Trump Media grants large amounts of stock to directors, including two who are Trump administration nominees*, CNN (Jan. 31, 2025) <https://amp.cnn.com/cnn/2025/01/31/investing/trump-media-share-gifts-patel-mcmahon>.