



September 23, 2025

Shelley Finlayson  
Chief of Staff and Program Counsel  
U.S. Office of Government Ethics  
250 E Street, SW., Suite 750  
Washington, DC 20024

Kateland Jackson  
Designated Agency Ethics Official  
Department of Homeland Security  
2707 Martin Luther King Jr. Ave SE  
Washington, DC 20528

Dear Ms. Finlayson and Ms. Jackson:

On Saturday afternoon, *MSNBC* reported that Thomas Homan, the current Border Czar to the President, received \$50,000 in cash from undercover FBI agents on September 20<sup>th</sup> of last year in exchange for future assistance in winning government contracts in a second potential Trump Administration.<sup>1</sup> If Mr. Homan did receive such a payment, it does not appear to have been reported on Mr. Homan's New Entrant OGE Form 278e, filed with the Department of Homeland Security on February 10, 2025.<sup>2</sup> As a result, Democracy Defenders Fund (DDF) calls on you to take the necessary actions to determine whether Mr. Homan falsified his report by failing to disclose this \$50,000 payment.

The Ethics in Government Act requires that each new public financial disclosure filer must provide a "full and complete statement" — including the "source, type, and amount" — of "income . . . from *any* source" that is received "in the year of filing and the preceding calendar year" and that is in excess of \$200.<sup>3</sup>

As a new filer, Mr. Homan was obligated to report all income he received in 2024 on his new entrant report. A review of that report identifies no payments of \$50,000.<sup>4</sup> The only compensation he has reported is \$360,000 in salary from his consulting firm, Homeland Strategic Consulting, LLC, as well as \$96,469 in speakers' fees from JL Wilkinson Consulting, and a variety of honoraria for speeches given in 2023 and 2024.<sup>5</sup>

Knowingly and willfully failing to report any information required to be reported on a public financial disclosure report is a criminal offense.<sup>6</sup> DDF therefore requests that you initiate an investigation to determine whether Mr. Homan's report is inaccurate considering these recent allegations.<sup>7</sup> If you conclude that Mr. Homan has failed to report this information, DDF requests that you direct Mr. Homan to update his report and that you refer the matter to the Attorney General.

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<sup>1</sup> Carol Leonnig & Ken Dilanian, *Tom Homan was investigated for accepting \$50,000 from undercover FBI agents. Trump's DOJ shut it down*, *MSNBC* (Sept. 22, 2025), <https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

<sup>2</sup> Thomas Homan, OGE Form 278e (Feb. 10, 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/08/Homan-Thomas.pdf>.

<sup>3</sup> 5 U.S.C. § 13104(a)(1)(A) (emphasis added), (b)(1)(A).

<sup>4</sup> Homan 278e, *supra* nt. 2.

<sup>5</sup> *Id.*

<sup>6</sup> 5 U.S.C. § 13106(a)(2)(ii); 18 U.S.C. § 1001(a).

<sup>7</sup> The U.S. Office of Government Ethics and agencies have the authority to investigate and direct any corrective action needed to obtain compliance with the financial disclosure requirements set forth in the EIGA. 5 U.S.C. § 13108(b)(3).

We thank you for your prompt attention to this matter,

/s/

Ambassador Norman Eisen (ret.)  
Executive Chair and Founder  
Democracy Defenders Fund

/s/

Virginia Canter  
Ethics and Anticorruption Chief Counsel and Director  
Democracy Defenders Fund

/s/

Chris Swartz  
Senior Ethics Counsel  
Democracy Defenders Fund