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H. RES. 353

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

IN THE HOUSE OF REPRESENTATIVES

APRIL 28, 2025

Mr. THANEDAR (for himself, Mr. MFUME, Mr. NADLER, and Ms. KELLY of Illinois) submitted the following resolution; which was referred to the Committee on the Judiciary

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

7 The Constitution provides that the House of Rep-
8 resentatives “shall have the sole Power of Impeachment”
9 and that the President “shall be removed from Office on
10 Impeachment for, and Conviction of, Treason, Bribery, or
11 other high Crimes and Misdemeanors”. Further, Article
12 II of the Constitution states that the President “shall take
13 Care that the Laws be faithfully executed”, the Fourth
14 Amendment of the Constitution states that “The right of
15 the people . . . against unreasonable searches and sei-
16 zures, shall not be violated”, and the Fifth Amendment
17 of the Constitution states “No person shall be . . . de-
18 prived of life, liberty, or property, without due process of
19 law”. In his conduct of the office of President of the
20 United States—and in violation of his constitutional oath
21 to faithfully to execute the office of President of the
22 United States and, to the best of his ability, preserve, pro-
23 tect, and defend the Constitution of the United States,
24 and in violation of his constitutional duty to take care that
25 the laws be faithfully executed—Donald John Trump has

1 abused the powers of the Presidency in a manner offensive
2 to, and subversive of, the Constitution, in that:

3 Using the power of his high office, Donald John
4 Trump has engaged in this scheme or course of conduct
5 through the following means:

6 (1) By his orders and directions to subordi-
7 nates, obstructed the administration of justice and
8 embarked on a scheme to destroy and corrupt the
9 legal system and the powers of the courts under Ar-
10 ticle III of the Constitution. Specifically, he has done
11 the following:

12 (A) Directed and permitted his subordi-
13 nates and attorneys at the Department of Jus-
14 tice to violate their oaths to uphold the Con-
15 stitution, laws of the United States, and the
16 rules of professional ethics by adducing mis-
17 leading and willfully false representations to the
18 courts of the United States, and to otherwise
19 abuse their official powers. Specifically, he
20 has—

21 (i) sought to dismiss, without preju-
22 dice and under false pretenses, the bribery
23 and fraud charges against New York City
24 Mayor Eric Adams, in an unethical quid
25 pro quo exchange for the Defendant's co-

1 operation with the Administration's polit-
2 ical priorities, thus abusing the criminal
3 laws to unconstitutionally commandeer a
4 State officer and unit of government in
5 violation of the sovereignty thereof; and

6 (ii) terminated and purged career De-
7 partment of Justice attorneys without rea-
8 sonable cause and in violation of the law in
9 retaliation for their legitimate investigatory
10 and prosecutorial work under prior admin-
11 istrations, including in relation to the Jan-
12 uary 6, 2021, attack on the United States
13 Capitol, and in retaliation for attorneys
14 upholding their ethical and legal obliga-
15 tions including candor and honesty to the
16 courts.

17 (B) Directed and permitted the evasion
18 and defiance of binding court orders. Specifi-
19 cally, he has—

20 (i) removed persons from the United
21 States to El Salvador despite an order
22 from the United States District Court for
23 the District of Columbia, for which said
24 Court has found probable cause that the

1 Government committed acts of criminal
2 contempt;

3 (ii) removed Kilmar Armando Abrego
4 Garcia from the United States to El Sal-
5 vador despite a binding Withholding of Re-
6 moval order prohibiting the government
7 from removing him to El Salvador;

8 (iii) defied court orders, upheld by a
9 unanimous ruling of the Supreme Court, to
10 facilitate the release of Mr. Abrego Garcia,
11 and related orders to provide information
12 to the court and opposing counsel, while
13 publicly flaunting their refusal;

14 (iv) acted in contempt of court for vio-
15 lating a court-sanctioned settlement agree-
16 ment; and

17 (v) conducted enforced disappearances
18 of persons without due process and without
19 disclosing their fate and location to their
20 families and legal counsel, in violation of
21 the Constitution and the rulings of the Su-
22 preme Court, as well as the foundational
23 principles of due process and the rule of
24 law.

1 (C) Directed and permitted the deliberate
2 and systematic violation of laws duly enacted by
3 Congress. Specifically, he has—

4 (i) terminated Inspector Generals, the
5 officers responsible for detecting and pre-
6 venting waste by auditing and inves-
7 tigating their respective agencies' oper-
8 ations and personnel, in violation of the
9 process stipulated by the Inspector Gen-
10 erals Act of 1974, as subsequently amend-
11 ed;

12 (ii) terminated a member of the Merit
13 Systems Protection Board, a tribunal cre-
14 ated to address widespread public concerns
15 about the Federal civil service; and

16 (iii) unlawfully transmitted sensitive
17 personal information of private citizens
18 and government employees in violation of,
19 among other Federal laws, the Privacy Act
20 and the Administrative Procedure Act.

21 In all of this, Donald John Trump has willfully dis-
22 regarded Federal laws and the Constitution, imperiled a
23 coequal branch of Government, and threatened the integ-
24 rity of the democratic system. He thereby betrayed his
25 trust as President, abused the powers of the Presidency,

7 Wherefore, Donald John Trump, by such conduct,
8 has demonstrated that he is unfit to govern a Nation by
9 and for the people, has acted in a manner grossly incom-
10 patible with self-governance and the rule of law, and will
11 remain a threat to the Constitution if allowed to remain
12 in office.

13 ARTICLE II: USURPATION OF THE APPROPRIATIONS
14 POWER

The Constitution provides that the House of Representatives “shall have the sole Power of Impeachment” and that the President “shall be removed from Office on Impeachment for, and Conviction of, Treason, Bribery, or other high Crimes and Misdemeanors”. Further, Section 9 of Article I of the Constitution states that “No money shall be drawn from the Treasury, but in Consequence of Appropriations made by Law”. In his conduct of the office of President of the United States—and in violation of his constitutional oath to faithfully to execute the office of President of the United States and, to the best of his abil-

1 ity, preserve, protect, and defend the Constitution of the
2 United States, and in violation of his constitutional duty
3 to take care that the laws be faithfully executed—Donald
4 John Trump has abused the powers of the Presidency in
5 a manner offensive to, and subversive of, the Constitution,
6 in that:

7 Using the powers of his high office, Donald John
8 Trump unlawfully usurped Congress and its power to ap-
9 propriate funds, thereby nullifying the Appropriations
10 Clause in the Constitution and violating the Impoundment
11 Control Act of 1974. Since taking office, he has signed
12 numerous Executive Orders directing agencies to withhold
13 funds appropriated by Congress. The President does not
14 have the power to override spending laws or impound ap-
15 propriated funds, a principle affirmed by numerous Su-
16 preme Court rulings.

17 Donald John Trump has withheld funds and termi-
18 nated en masse Federal employees and numerous Federal
19 agencies and departments, including the following:

20 (1) Directed the dismantling of the Department
21 of Education. As enacted in the Department of Edu-
22 cation Organization Act, signed into law by Presi-
23 dent Jimmy Carter, the Department of Education
24 was established by Congress to create reform in the
25 education system throughout the country, distribute

1 Federal aid to students and places of learning, and
2 prohibit discriminatory practices. The President does
3 not have the authority to dismantle the Department
4 of Education, and his signing of Executive Order
5 14242, which aims to “Improving Education Out-
6 comes by Empowering Parents, States, and Commu-
7 nities”, violates the law and the Constitution.

8 (2) Unlawfully directed the elimination of the
9 United States Agency for International Development
10 (USAID). As enacted in the Foreign Assistance Act
11 of 1961, signed into law by President John F. Ken-
12 nedy, USAID plays a crucial role in delivering for-
13 eign assistance worldwide, including disaster relief,
14 conflict relief, combating global diseases, promoting
15 educational programs, and enhancing food security
16 in developing countries. By dismantling USAID and
17 freezing foreign assistance, he has severed the
18 United States from its humanitarian role as directed
19 by Congress, leaving other countries and potentially
20 our adversaries to fill in the role the United States
21 has abandoned.

22 (3) Created the so-called “Department of Gov-
23 ernment Efficiency (DOGE)”, which has imposed
24 payment holds and rescinded funds after disburse-
25 ment. Donald John Trump has utilized DOGE to

1 unlawfully block or impound appropriated funds to
2 dozens of Federal agencies, including the National
3 Institutes of Health, the Federal Aviation Adminis-
4 tration, and the Department of Veterans Affairs. By
5 impounding congressionally appropriated funds,
6 Donald John Trump and DOGE have not only vio-
7 lated the law, but have negatively impacted the
8 American people by cutting jobs, halting critical
9 services, and rescinding grants for programs, in defi-
10 ance of the express, constitutionally binding will of
11 Congress.

12 Using the powers of his high office, Donald John
13 Trump has unlawfully withheld congressionally appro-
14 priated funds and attempted to dismantle congressionally
15 mandated agencies. By withholding funds and crippling
16 agencies, he has prevented the Federal Government from
17 performing critical duties here and abroad. He has threat-
18 ened the well-being of United States citizens through the
19 gross misconduct of his office, resulting in dire and life-
20 threatening consequences on the world's most vulnerable
21 populations.

22 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 III: ABUSE OF TRADE POWERS AND
4 INTERNATIONAL AGGRESSION

5
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, Section
11 8 of Article I of the Constitution states, “Congress shall
12 have Power To lay and collect Taxes, Duties, Imposts and
13 Excises, . . . but all Duties, Imposts and Excises shall
14 be uniform throughout the United States”. In his conduct
15 of the office of President of the United States—and in
16 violation of his constitutional oath to faithfully to execute
17 the office of President of the United States and, to the
18 best of his ability, preserve, protect, and defend the Con-
19 stitution of the United States, and in violation of his con-
20 stitutional duty to take care that the laws be faithfully
21 executed—Donald John Trump has abused the powers of
22 the Presidency in a manner offensive to, and subversive
23 of, the Constitution, in that:

24 Using the powers of his high office, Donald John
25 Trump abused trade powers by imposing unjustifiable and
26 unreasonable tariffs on foreign nations, causing a sharp

1 decline in the United States economy and the economies
2 of countries around the world, and declaring the false ex-
3 istence of a national security emergency to justify his ac-
4 tions. Donald John Trump’s tariffs contradicted trade
5 agreements established by his Administration and other
6 administrations, including the duly ratified and binding
7 treaty obligations of the United States, thereby breaking
8 international laws and norms, leading to countries around
9 the world to enact damaging tariffs on goods and services
10 originating from the United States. His “Liberation Day”
11 scheme, which imposed 10 percent tariffs on all countries,
12 as well as additional tariffs based on a formula for “reci-
13 procity” widely mocked as nonsensical, led to the most sig-
14 nificant drop in the financial markets since the 2020 crash
15 triggered by the COVID–19 pandemic.

16 Additionally, Donald John Trump has threatened for-
17 eign nations with invasion, the annexation of territory,
18 and the occupation of sovereign territory through the use
19 of military action. By doing this, he has implicated the
20 United States and himself in violation of constitutionally
21 binding treaty obligations, to include the North Atlantic
22 Treaty of 1949, the General Treaty for Renunciation of
23 War as an Instrument of National Policy of 1928, the
24 Charter of the United Nations of 1945, and the Inter-

1 American Treaty of Reciprocal Assistance of 1947. Don-
2 ald John Trump threatened the following:

3 (1) Annexation of the sovereign country of Can-
4 ada. Donald John Trump has negatively impacted
5 the deep and historic relationship between the
6 United States and Canada by stating numerous
7 times that Canada should become the 51st State,
8 under the threat of both economic coercion and mili-
9 tary force.

10 (2) Unlawful and aggressive military action
11 within Mexico, to include drone strikes and the use
12 of special operations military personnel, ostensibly
13 against drug cartels, in violation of the sovereignty
14 and territorial integrity of that country and without
15 any congressional authorization to use military force.

16 (3) Annexation of Greenland, an autonomous
17 territory in the Kingdom of Denmark. Donald John
18 Trump has continued to use hostile language aimed
19 at taking control of Greenland, stating that the
20 United States will “go as far as we have to go” to
21 obtain control of Greenland. He has refused to rule
22 out military action to gain control of the territory,
23 in violation of international law and despite Den-
24 mark’s longstanding alliance and friendly relations
25 with the United States.

1 (4) Annexation of the Panama Canal, owned
2 and controlled by Panama. During a joint session
3 speech to Congress, Donald John Trump stated that
4 his Administration “will be reclaiming the Panama
5 Canal”. He has refused to rule out military or eco-
6 nomic action against the sovereign country.

7 (5) Annexation of the Gaza Strip, involving the
8 forced resettlement of the Palestinian population to
9 the surrounding countries. Donald John Trump has
10 stated that the United States “will take over the
11 Gaza Strip” and “own it”. His proposal of taking
12 over the Gaza Strip and the expulsion of its popu-
13 lation violates international law, including the Con-
14 vention on the Prevention and Punishment of the
15 Crime of Genocide, would be unconstitutional absent
16 the approval of the United States Congress, and is
17 profoundly unserious in light of the grave humani-
18 tarian situation and ongoing armed conflict in Gaza.

19 Using the powers of his high office, Donald John
20 Trump has unlawfully conducted himself, bringing shame
21 and embarrassment to the office of the Presidency and
22 the people of the United States. He has betrayed the trust
23 of the Nation to conduct meaningful diplomatic negotia-
24 tions as its chief diplomat and failed to maintain peaceful
25 economic and defense relations with foreign countries. He

1 has threatened the security of the United States through
2 gross misconduct of his office, prompting hostilities to-
3 wards Americans here and abroad, as well as foreign na-
4 tions warning their citizens against visiting the United
5 States, further harming the Nation's economy.

6 Wherefore, Donald John Trump, by such conduct,
7 has demonstrated that he is unfit to govern a Nation by
8 and for the people, has acted in a manner grossly incom-
9 patible with self-governance and the rule of law, and will
10 remain a threat to the Constitution if allowed to remain
11 in office.

12 ARTICLE IV: VIOLATION OF FIRST AMENDMENT RIGHTS

13

14 The Constitution provides that the House of Rep-
15 resentatives “shall have the sole Power of Impeachment”
16 and that the President “shall be removed from Office on
17 Impeachment for, and Conviction of, Treason, Bribery, or
18 other high Crimes and Misdemeanors”. Further, the First
19 Amendment of the Constitution states “Congress shall
20 make no law respecting an establishment of religion, or
21 prohibiting the free exercise thereof; or abridging the free-
22 dom of speech, or of the press; or the right of the people
23 peaceably to assemble, and to petition the Government for
24 a redress of grievances”. In his conduct of the office of
25 President of the United States—and in violation of his
26 constitutional oath to faithfully to execute the office of

1 President of the United States and, to the best of his abil-
2 ity, preserve, protect, and defend the Constitution of the
3 United States, and in violation of his constitutional duty
4 to take care that the laws be faithfully executed—Donald
5 John Trump has abused the powers of the Presidency in
6 a manner offensive to, and subversive of, the Constitution,
7 in that:

8 By his orders and directions to subordinates, retali-
9 ated against law firms and attorneys who have advised or
10 represented, or been associated with those who advise or
11 represent, litigants who displease him, in violation of the
12 Constitution’s prohibition on retaliation against individ-
13 uals for engaging in First Amendment-protected conduct,
14 including the right to petition the government for redress
15 of grievances. Specifically, he has, barred attorneys at cer-
16 tain law firms from access to Federal buildings, arbitrarily
17 revoked security clearances without a reasonable basis,
18 threatened to cancel Federal contracts with any entity en-
19 gaging the targeted attorneys and firms, and demanded
20 pro bono services from law firms in exchange for the dis-
21 continuation of the punitive Executive orders.

22 Additionally, Donald John Trump has engaged in a
23 pattern of unconstitutional, unlawful, and corrupt retalia-
24 tion against critics and political opponents, a flagrant vio-
25 lation of constitutional rights protected by the First

1 Amendment. He has weaponized the Department of Jus-
2 tice and other agencies to engage in spurious investiga-
3 tions and harassment, with no basis in law, of public fig-
4 ures and his perceived political enemies.

5 Since taking office, Donald John Trump has directed
6 the Department of Justice to dismiss more than a dozen
7 prosecutors who were involved in investigations against
8 him after he left office in 2021. The Department of Jus-
9 tice has subsequently launched investigations into officials
10 involved in prior probes against Donald John Trump, in
11 some cases against individuals specifically named and ac-
12 cused in flagrantly improper Executive orders.

13 Furthermore, he has made direct and unambiguous
14 public statements threatening media outlets, current and
15 former officeholders, and advocacy organizations. He has
16 pursued meritless litigation, leveraged his public office for
17 private gain, and perverted the course of justice and the
18 integrity of the judicial system to extract tens of millions
19 of dollars in putative settlements, effectively acting as a
20 conduit for flagrant bribery and extortion. He has re-
21 stricted the access of the Associated Press after they re-
22 fused to use the name “Gulf of America” in their report-
23 ing and has defied court orders to cease this unconstitu-
24 tional action. He has also threatened current and former
25 members of Congress for the exercise of their legislative

1 and oversight functions, an attack on the independence of
2 Congress as a coequal branch of government as estab-
3 lished by the Constitution’s Article I Vesting Clause, and
4 by the Constitution’s Speech or Debate Clause, in addition
5 to the First Amendment.

6 For example, Donald John Trump has repeatedly
7 threatened members of the House Select Committee on
8 the January 6th Attack on the United States Capitol,
9 which investigated the attack on the Capitol that Donald
10 John Trump instigated. Donald John Trump has sought
11 to intimidate the members and staff of the United States
12 House Select Committee on the January 6th Attack, stat-
13 ing that they “should fully understand that they are sub-
14 ject to investigation at the highest level” and expressing
15 a desire to remove the pardons they received, stating “The
16 ‘Pardons’ that Sleepy Joe Biden gave to the Unselect
17 Committee of Political Thugs, and many others, are here-
18 by declared [void, vacant, and of no further force or ef-
19 fect]”.

20 Donald John Trump has made it clear that he will
21 not rest until all of his perceived political enemies are
22 eliminated. In a speech addressing his Department of Jus-
23 tice subordinates, Donald John Trump further laid out his
24 fascist vision for the Department of Justice. He has tar-
25 geted watchdog organizations like the Citizens for Respon-

1 sibility and Ethics in Washington, calling them “scum”
2 and independent media outlets like CNN and MSNBC, la-
3 belling them as organizations that “literally write 97.6
4 percent bad about me, are political arms of the Democrat
5 Party. And in my opinion, they are really corrupt and they
6 are illegal. What they do is illegal.”. He has stated that
7 newspapers critical of him are “really no different than
8 a highly paid political operative. And it has to stop. It
9 has to be illegal. It’s influencing judges . . . it just cannot
10 be legal.”.

11 By these and many other actions, he has sought to
12 outlaw dissent, opposition, and criticism of himself and his
13 Administration. This attack on the constitutional rights
14 to freedom of speech, and of association, and of the right
15 to petition the government for redress of grievances, is
16 wholly incompatible with the rights and liberties of the
17 People of the United States as a self-governing people
18 under the rule of law.

19 In purpose and effect, he has attempted to suppress
20 dissent and opposition, casting a chilling effect over the
21 public discourse, and striking at the core freedoms essen-
22 tial to a free society and democratic elections under the
23 Constitution.

24 Wherefore, Donald John Trump, by such conduct,
25 has demonstrated that he is unfit to govern a Nation by

1 and for the people, has acted in a manner grossly incom-
2 patible with self-governance and the rule of law, and will
3 remain a threat to the Constitution if allowed to remain
4 in office.

5 ARTICLE V: CREATION OF UNLAWFUL OFFICE

6

7 The Constitution provides that the House of Rep-
8 resentatives “shall have the sole Power of Impeachment”
9 and that the President “shall be removed from Office on
10 Impeachment for, and Conviction of, Treason, Bribery, or
11 other high Crimes and Misdemeanors”. Further, Section
12 2 of Article II of the Constitution states that the President
13 “shall appoint Ambassadors, other public Ministers and
14 Consuls, Judges of the supreme Court, and all other Offi-
15 cers of the United States . . . but the Congress may by
16 Law vest the Appointment of such inferior Officers, as
17 they think proper, in the President alone, in the Courts
18 of Law, or in the Heads of Departments”. In his conduct
19 of the office of President of the United States—and in
20 violation of his constitutional oath to faithfully to execute
21 the office of President of the United States and, to the
22 best of his ability, preserve, protect, and defend the Con-
23 stitution of the United States, and in violation of his con-
24 stitutional duty to take care that the laws be faithfully
25 executed—Donald John Trump has abused the powers of

1 the Presidency in a manner offensive to, and subversive
2 of, the Constitution, in that:

3 Using the powers of his high office, Donald John
4 Trump has, through unlawful orders and directives, cre-
5 ated an unlawful office, the so-called Department of Gov-
6 ernment Efficiency (“DOGE”), and assigned an extensive
7 range of unlawful powers, effectively granting this fla-
8 grantly unconstitutional creation significant control over
9 the executive branch. Donald John Trump has appointed
10 Mr. Elon Musk as the de facto head of this contrived enti-
11 ty, which was not created or funded by any law, without
12 a formal title or office. These actions have been in direct
13 violation of the Constitution’s requirement that principal
14 officers of the United States must be created by law and
15 their appointees confirmed by the Senate, and that inferior
16 offices must be created by law with their appointment
17 vested as Congress may determine.

18 Additionally, he has vested these powers in Mr. Musk
19 without complying with the constitutional requirement
20 that all officers of the United States be commissioned by
21 the President and swear an oath of office to support the
22 Constitution. Mr. Musk has been designated as a special
23 government employee of the White House Office, in viola-
24 tion of statutory authorization and restrictions on such
25 designations. This false claim has also been used to com-

1 mit violations of the ethics, disclosure, and conflict-of-in-
2 terest laws applicable to government officers and regular
3 employees.

4 Contrary to the Government’s claims in court, Mr.
5 Musk has exercised de facto control over DOGE and,
6 through it, control over a wide range of Government de-
7 partments and agencies. This unmistakable reality has
8 been repeatedly and openly stated by the Trump Adminis-
9 tration, including by Donald John Trump’s own address
10 to Congress on March 4, 2025. In this capacity, Mr. Musk
11 and his subordinates have undertaken numerous violations
12 of the Constitution and laws, including by—

13 (1) impoundment of funds appropriated by
14 Congress;

15 (2) violations of privacy and security laws with
16 respect to sensitive information systems, personally
17 identifiable information, and classified material; and

18 (3) termination of government employees under
19 false pretenses and in violation of civil service laws.

20 These actions have vastly exceeded the terms of the
21 formal executive orders purporting to create DOGE under
22 the direction of a “U.S. DOGE Service Administrator”,
23 an office which remained vacant for several weeks, with
24 the Government’s own attorneys claiming in court that the
25 official head of DOGE was unknown to them. Since that

1 time, a nominal Administrator has been named, despite
2 the repeated avowals from the President and his Adminis-
3 tration that Mr. Musk controls and directs DOGE, as con-
4 firmed by ample public reporting and Mr. Musk’s own
5 statements.

6 Donald John Trump has abused the powers of his
7 high office and breached the public trust by establishing
8 the so-called Department of Government Efficiency and
9 unconstitutionally placing Mr. Musk in control of this enti-
10 ty, knowingly provided false testimony to the court regard-
11 ing the leadership of the said entity, and directing the un-
12 lawful entity to implement his agenda, in violation of the
13 Constitution’s objective of establishing Justice and funda-
14 mental rules for how the executive branch of the United
15 States is to be structured and how persons may be ap-
16 pointed to public office.

17 Wherefore, Donald John Trump, by such conduct,
18 has demonstrated that he is unfit to govern a Nation by
19 and for the people, has acted in a manner grossly incom-
20 patible with self-governance and the rule of law, and will
21 remain a threat to the Constitution if allowed to remain
22 in office.

23 ARTICLE VI: BRIBERY AND CORRUPTION

24
25 The Constitution provides that the House of Rep-
26 resentatives “shall have the sole Power of Impeachment”

1 and that the President “shall be removed from Office on
2 Impeachment for, and Conviction of, Treason, Bribery, or
3 other high Crimes and Misdemeanors”. Further, Section
4 9 of Article I of the Constitution states that “no Person
5 holding any Office of Profit or Trust under them, shall,
6 without the Consent of the Congress, accept of any
7 present, Emolument, Office, or Title, of any kind what-
8 ever, from any . . . foreign State”. In his conduct of the
9 office of President of the United States—and in violation
10 of his constitutional oath to faithfully to execute the office
11 of President of the United States and, to the best of his
12 ability, preserve, protect, and defend the Constitution of
13 the United States, and in violation of his constitutional
14 duty to take care that the laws be faithfully executed—
15 Donald John Trump has abused the powers of the Presi-
16 dency in a manner offensive to, and subversive of, the Con-
17 stitution, in that:

18 Donald John Trump has engaged in a pattern of un-
19 lawful corruption for the personal profit of himself and
20 his associates, soliciting and accepting bribes in exchange
21 for official actions, policy influence, and favorable treat-
22 ment from the Administration. In so doing, he has, beyond
23 a reasonable doubt, profiteered from public office on a
24 scale unprecedented in American history.

1 Donald John Trump has engaged in fraudulent con
2 artist schemes through “pump and dump” or “rug pull”
3 tactics for cryptocurrency tokens he has created, and at
4 the same time, enabled a direct conduit for bribes paid
5 to him in exchange for official actions.

6 Donald John Trump has also leveraged the threat of
7 hostile government action and the corresponding offer of
8 preferential treatment in order to extract large payments
9 in the form of settlements for meritless and vexatious liti-
10 gation he pursues in his personal capacity, thereby cor-
11 rupting both the executive branch and the judiciary. To
12 advance this end, Donald John Trump solicited and re-
13 ceived \$940,000,000 in pro bono services from prominent
14 law firms to help causes he personally supports.

15 Donald John Trump has refused to divest himself or
16 take any steps to prevent conflicts of interest in his sub-
17 stantial personal business ventures, creating another con-
18 duit for the payment of bribes.

19 Donald John Trump has permitted and encouraged
20 his subordinates to violate laws regarding ethics, disclo-
21 sures, and self-dealing, and through these actions, he has
22 enabled and encouraged corruption and graft by his rel-
23 atives, associates, and political allies.

24 Donald John Trump has, in these ways and others,
25 solicited payments from foreign governments for corrupt

1 purposes and in flagrant violation of the Constitution's
2 prohibition on foreign emoluments.

3 Wherefore, Donald John Trump, by such conduct,
4 has demonstrated that he is unfit to govern a Nation by
5 and for the people, has acted in a manner grossly incom-
6 patible with self-governance and the rule of law, and will
7 remain a threat to the Constitution if allowed to remain
8 in office.

9 ARTICLE VII: TYRANNY

10

11 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 sys-
16 tem of checks and balances, as well as the separation of
17 powers, as defined in the Constitution, work to ensure that
18 the Office of the President does not become tyrannical.
19 In his conduct of the office of President of the United
20 States—and in violation of his constitutional oath to faith-
21 fully to execute the office of President of the United States
22 and, to the best of his ability, preserve, protect, and defend
23 the Constitution of the United States, and in violation of
24 his constitutional duty to take care that the laws be faith-
25 fully executed—Donald John Trump has abused the pow-

1 ers of the Presidency in a manner offensive to, and subver-
2 sive of, the Constitution, in that:

3 He has, by his actions and statements, sought to es-
4 tablish himself as tyrant, dictator, and autocrat over the
5 People of the United States, usurping unto himself the
6 constitutional powers of Congress, the courts, and the
7 States, and powers illegitimate and beyond the scope of
8 lawful government altogether.

9 He has claimed for himself absolute and arbitrary
10 power, the ability to suspend laws at whim, and utterly
11 disregarded and betrayed his oath to faithfully execute the
12 office of President of the United States and to preserve,
13 protect, and defend the Constitution of the United States.

14 He has denied and violated the right of the People
15 of the United States to freedom of speech, and of assem-
16 bly, and to petition the government for redress of griev-
17 ances.

18 He has denied and violated the right of the People
19 of the United States to due process of law and equal pro-
20 tection under the laws, to fair and impartial independent
21 courts, and to legal counsel.

22 He has sought to intimidate and coerce, by means
23 including the threat of unlawful prosecutions and by en-
24 couraging violence and threats of violence, the Representa-
25 tives and Senators in Congress.

1 He has denied and violated the separation of powers
2 and the Constitution's system of checks and balances, ar-
3 rogating unto himself the legislative and judicial powers,
4 including the power of Congress to levy taxes, appropriate
5 public funds, direct the organization of officers and agen-
6 cies of the executive branch, and to make laws.

7 He has sought to intimidate, coerce, and extort the
8 officers of the several States, including those elected by
9 the People thereof, and thereby sought to commandeer the
10 several States, in violation of their sovereignty and the
11 system of federalism established by the Constitution of the
12 United States.

13 He has sought to abrogate the citizenship clause of
14 the 14th Amendment to the Constitution, by means in-
15 cluding the issuance of an executive order that directs ex-
16 ecutive departments and agencies to withhold citizenship
17 from certain classes of persons who are born within the
18 United States.

19 He has repeatedly threatened and suggested that he
20 intends to violate the Presidential term limits established
21 by the 22d Amendment to the Constitution, and adopted
22 overtly monarchical aspirations and affectations, including
23 by invoking and endorsing theories that he is above the
24 law or that his personal will constitutes the law.

1 In all of this, Donald John Trump has willfully dis-
2 regarded Federal laws and the Constitution, imperiled a
3 coequal branch of Government, and threatened the integ-
4 rity of the democratic system. He thereby betrayed his
5 trust as President, abused the powers of the Presidency,
6 acted in a manner grossly incompatible with self-govern-
7 ance and the rule of law, and has committed High Crimes
8 and Misdemeanors in attempting to establish himself as
9 a lawless tyrant to the manifest injury of the people of
10 the United States.

11 Wherefore, Donald John Trump, by such conduct,
12 has demonstrated that he is unfit to govern a Nation by
13 and for the people, has acted in a manner grossly incom-
14 patible with self-governance and the rule of law, and will
15 remain a threat to the Constitution if allowed to remain
16 in office.

