

Congress of the United States

Washington, DC 20515

November 15, 2023

Patrick Kevin Morris
PKM Law
337 S Robertson Blvd #203
Beverly Hills, CA 90211-3602

Dear Mr. Morris:

The House Committee on Oversight and Accountability (Oversight Committee), the House Committee on the Judiciary (Judiciary Committee), and the House Committee on Ways and Means (Ways and Means Committee, and with the Oversight Committee and Judiciary Committee, the Committees) are investigating whether sufficient grounds exist to draft articles of impeachment against President Biden for consideration by the full House. We set forth in a September 27, 2023 memorandum the evidence justifying the inquiry and the scope of this impeachment investigation.¹

The Oversight Committee has reviewed bank records of individuals and entities associated with the Biden family as well as other evidence. This review uncovered a pattern of financial complexity. As detailed in the Impeachment Memorandum² and the Oversight Committee's Bank Memoranda, the Biden family used corporate bank accounts of third-party associates to receive wires from foreign companies and foreign nationals.³ The Biden business associates then dispersed money to various Biden family members in incremental payments over time.⁴ Moreover, subsequent to the initiation of the impeachment inquiry, the Committees subpoenaed bank records associated with Biden family members, and those documents raise additional concerns. For example, the Oversight Committee's review of subpoenaed records shows how James Biden used his bank accounts to accept "loans" from a domestic company and other individuals by leveraging the Biden name.

Evidence also shows that President Biden was at least aware of some of his family's business ventures and sought to influence potential business deals that financially benefited his family. Indeed, a Biden business associate, Devon Archer, testified how the Biden "brand" was used in retaining business, and that Joe Biden met with some of the business associates who paid

¹ Memorandum (Sept. 27, 2023). From Hon. James Comer, Chairman, H. Comm. on Oversight & Accountability, Hon. Jim Jordan, Chairman, H. Comm. on the Judiciary, & Hon. Jason Smith, Chairman, H. Comm. on Ways & Means, to H. Comm. on Oversight & Accountability, H. Comm. on the Judiciary, & H. Comm. on Ways & Means. Re: Impeachment Inquiry.

² *Id.*

³ *See, e.g.*, Memorandum (Mar. 16, 2023), H. Comm. on Oversight & Accountability. From Maj. Comm. Staff to Comm. Members. Re: New Evidence Resulting from the Oversight Committee's Investigation into the Biden Family's Influence Peddling and Business Schemes.

⁴ *Id.*

his family.⁵ The Committees have identified you as possessing information relevant to our investigation and seek your testimony regarding these and related topics. This request is made pursuant to that inquiry. Both public reporting and evidence reviewed by the Committees suggest that you have personally lent money to, or otherwise satisfied debts on behalf of, Hunter Biden. For example, the *New York Times* has reported that you have “quietly taken on an expansive role as a financier, confidant and would-be avenger for [Hunter] Biden, handling sensitive subjects for President Biden’s son.”⁶ Notably, you reportedly “lent more than \$2 million to Hunter Biden, which went to supporting his family and paying back taxes that are a subject of the ongoing federal investigation.”⁷

Furthermore, Hunter Biden attempted to plead guilty to failing to pay his required tax liability, and the Committees have obtained testimony that alleges you made tax payments on behalf of Hunter Biden.⁸ Indeed, Hunter Biden’s collapsed plea deal noted that “a third party” made significant payments of \$955,800, \$956,632, \$492,000, and \$197,000 to the Internal Revenue Service on behalf of Hunter Biden.⁹ The Committees seek information about the unnamed third party, including whether you are that person. The Committees are interested in understanding the nature and purpose of any loans to or payments on behalf of Hunter Biden that may have occurred while Joe Biden was either a candidate for public office or holding public office. Among other things, the Committees intend to understand the terms of such “loans” you made to Hunter Biden and what benefits you may have received as a result of providing financial assistance to President Biden’s son.

As part of our investigation, the Committees seek to craft legislative solutions aimed at deficiencies they have identified in the current legal framework regarding ethics laws and the disclosure of financial interests related to the immediate family members of Vice Presidents and Presidents. These deficiencies may place American national security and interests at risk. They may also provide opportunities for domestic corruption. The Committees are seeking meaningful reforms to government ethics and disclosure laws that will provide necessary transparency into a Vice President’s or President’s immediate family members’ income, assets, and financial relationships.

The Committees also intend to craft legislation that would strengthen reporting requirements related to certain foreign transactions involving senior elected officials’ family members and that would implement robust financial disclosure requirements that shed light on ownership of opaque corporate entities. Moreover, in order to prevent financial transactions from being structured in a way to evade oversight, the Committees are examining whether certain reporting requirements, including any new reporting requirements for senior elected officials’ family members, should extend for a period of time after a President or Vice President leaves office.

⁵ Transcript of Devon Archer, H. Comm. on Oversight & Accountability (July 31, 2023).

⁶ Kenneth P. Vogel & Michael S. Schmidt, *For Financial Help and Counsel, Hunter Biden Turns to Hollywood Lawyer*, *The New York Times* (May 10, 2022).

⁷ *Id.*

⁸ See Transcript of Special Agent, Internal Revenue Service, H. Comm. on Ways and Means, at 73, 100.

⁹ Politico, *Read the proposed Hunter Biden plea agreement* (Jul. 26, 2023) at 35.

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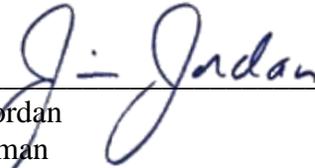
Accordingly, we request you make yourself available for a transcribed interview with Committee counsel. If you have any questions regarding this interview, please coordinate with James Mandolfo and Jake Greenberg with Oversight Committee staff at (202) 225-5074, Steve Castor with Judiciary Committee staff at (202) 225-6906, and Sean Clerget with Ways and Means Committee staff at (202) 225-3625. Please contact staff by November 22, 2023, to schedule the interview.

Thank you for your prompt attention to this important investigation.

Sincerely,



James Comer
Chairman
Committee on Oversight and Accountability



Jim Jordan
Chairman
Committee on the Judiciary



Jason Smith
Chairman
Committee on Ways and Means

cc: The Honorable Jamie Raskin, Ranking Member
Committee on Oversight and Accountability

The Honorable Jerrold L. Nadler, Ranking Member
Committee on the Judiciary

The Honorable Richard Neal, Ranking Member
Committee on Ways and Means