

Congress of the United States
House of Representatives
Washington, DC 20515-4305

April 23, 2024

The Honorable Merrick Garland
Attorney General
U.S. Department of Justice 950
Pennsylvania Avenue, N.W.
Washington, DC 20530

Alvin L. Bragg, Jr.
District Attorney
County of New York
One Hogan Place
New York, NY 10013

Dear Attorney General Garland and District Attorney Bragg:

The politicized persecution of former President Trump and the collusion between the Biden Administration's Department of Justice (DOJ) and the Manhattan District Attorney (DA) General's Office have raised several concerns among the public. Particularly, Manhattan DA Alvin Bragg brought charges against President Trump to trial in the middle of an election year, eight years after the alleged incident, which indicates a coordinated effort to target his campaign.

In addition to the rather suspicious timing of these coordinated efforts, DA Bragg hired Matthew Colangelo, a senior attorney in the Biden Administration's DOJ, in December 2022.¹ This decision came a few months before the Manhattan DA's office announced President Trump's indictment in April 2023.

The fact that Colangelo stepped down from a senior DOJ role to join a prosecution team in a city DA office raises some pressing concerns. While these serious underlying issues substantially overshadow the integrity and fairness of the trial, the New York judge instead issued a gag order barring President Trump from raising concerns about witnesses, prosecutors, court staff, and jurors, which includes Colangelo as one of the prosecutors.²

To ensure transparency and accountability are upheld in this case, I request immediate access to all records and communication in relation to the Department of Justice and the Manhattan District Attorney General's Office process of hiring Matthew Colangelo. Please preserve all information relating to this process, including all documents, communications, and other information, including electronic information and metadata, that is or may be potentially responsive to a congressional inquiry, request, or investigation. Specifically, this information must include any communication between DA Bragg and Mr. Colangelo and/or other DOJ

¹ Manhattan District Attorney's Office, "District Attorney Bragg Announces Matthew Colangelo as New Senior Counsel." Dec. 5, 2022. <https://manhattanda.org/district-attorney-bragg-announces-matthew-colangelo-as-new-senior-counsel/>

² Michael Sisak, "Judge issues gag order barring Donald Trump from commenting on witnesses, others in hush money case." *APNews*, Mar. 26, 2024. <https://apnews.com/article/trump-gag-order-hush-money-new-york-68317dee722581bfbde51c305788b614>

officials while Mr. Colangelo was still employed with DOJ. Additionally, this information must include any communication between Mr. Colangelo and any Biden Administration officials regarding his employment with the Manhattan District Attorney General's Office while Mr. Colangelo was still employed with DOJ.

For the purpose of this request, "preserve" means securing and maintaining the integrity of all relevant documents, communications, and other information, including electronic information and metadata, by taking reasonable steps to prevent the partial or full destruction, alteration, testing, deletion, shredding, incineration, wiping, relocation, migration, theft, mutation, or negligent or reckless handling that could render the information incomplete or inaccessible. This includes preserving all compilations of documents that have already been gathered in response to requests, even if copies of individual documents may still exist elsewhere.

Additionally, I request a response to the following questions no later than May 24, 2024:

1. Was Mr. Colangelo asked to leave by the DOJ, or did he accept a position in a lower office voluntarily?
2. If Mr. Colangelo was instructed to leave, what was he promised in return for accepting such a substantial demotion from his position at DOJ to joining a Manhattan DA prosecution team?
3. Is Mr. Colangelo still in contact with DOJ officials since joining the Manhattan DA prosecution team?
4. Has Mr. Colangelo, in his capacity at the Manhattan DA's office, coordinated with DOJ and other state attorneys in Trump-related indictments?

The Department of Justice under President Biden has proven to be a cesspool of partisanship, further evident by the hyper-politicized courts that have taken up President Trump's criminal trials. DA Bragg's decision to hire Mr. Colangelo, a former DOJ official with close ties to the White House and Attorney General Garland, is yet another example of the unconstitutional approach to President Trump's trial. I look forward to your timely and detailed response to this request to restore transparency to our judicial system.

Sincerely,

A handwritten signature in black ink that reads "Lance Gooden". The signature is written in a cursive, flowing style.

Lance Gooden
Member of Congress