

Congress of the United States
Washington, DC 20515

July 31, 2025

The Honorable Pam Bondi
U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

Dear Attorney General Bondi:

We write to request information regarding the Department of Justice's (DOJ or the Department) efforts to prioritize denaturalization cases over the Civil Division's traditional priorities, such as fraud cases, national security issues, liability claims, and consumer protection. When legal permanent residents become U.S. citizens they take an Oath of Allegiance. In that oath they "renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty..." and affirm that they "will support and defend the Constitution and laws of the United States of America." This is a permanent contract of the most serious nature: that in taking that Oath of Allegiance, you are now truly American forever and are now charged with all the rights and the responsibilities that are attached to that new status. You are no longer a "guest" of the United States, your status in this country is not temporary, you have the extraordinary privilege of voting and you have new fundamental rights as a citizen of this country. This contract, therefore, is not one to summarily curtail, revoke or weaponize.

It is, therefore, extremely disturbing that on June 11, Assistant Attorney General Brett Shumate sent a memorandum to the employees of DOJ's Civil Division instructing them to "prioritize and maximally pursue denaturalization proceedings in all cases permitted by law and supported by the evidence."¹ Denaturalization—the revocation of citizenship, which can often leave an individual stateless, has been used in the United States for good and it has been dangerously weaponized. It was used for decades to remove former Nazis who came to America and lied about their atrocious crimes and genocidal actions to become U.S. citizens.² This was a necessary use based on rigorous work by dedicated DOJ officials who ensured that justice was served, while also respecting the due process rights of even those people who had committed the most heinous of crimes during the Holocaust. However, it was also weaponized during the McCarthy era, when roughly 22,000 people were denaturalized.³ The Supreme Court put a stop to this reprehensible practice in 1967, ruling in *Afroyim v. Rusk* that "The very nature of our free government makes it completely incongruous to have a rule of law under which a group of citizens temporarily in office can deprive another group of citizens of their citizenship."⁴ Following that case, denaturalization rates appropriately and precipitously dropped, and cases were brought only in the most egregious of circumstances, generally where the naturalization was obtained through fraudulent means, with a nexus to terrorism or a legitimate threat to

¹ Memorandum from Brett A. Shumate, Assistant Attorney General, to all Civil Division Employees on Civil Division Enforcement Priorities (Jun. 11, 2025) <https://www.justice.gov/civil/media/1404046/dl?inline>.

² Hannah Rabinowitz, *Law used to kick out Nazis could be used to strip citizenship from many more Americans*, CNN (Jul. 4, 2025), <https://www.cnn.com/2025/07/04/politics/justice-department-trump-denaturalization>.

³ Robertson, Cassandra Burke and Manta, Irina D., "(Un)Civil Denaturalization" (2019), Faculty Publications 422, 2026.

https://scholarlycommons.law.case.edu/faculty_publications/2026.

⁴ *Afroyim v. Rusk*, 387 U.S. 253, 268 (1967).

national security.⁵ The number of denaturalization cases brought in the years immediately following the *Afroyim* case averaged in the single digits.⁶ There were an average of 11 denaturalization cases per year filed between 1990 and 2017, an average of 42 cases per year filed during President Trump's first term, and an average of 16 cases per year filed under President Biden.⁷

In contrast, Assistant Attorney General Shumate's memorandum lays out a wide variety of case types to prioritize for denaturalization, including any case the Civil Division "determines to be sufficiently important to pursue."⁸ The memorandum further widens the aperture of cases the Department may pursue, stating, "these categories do not limit the Civil Division from pursuing any particular case...the Civil Division retains the discretion to pursue cases outside of these categories as it determines appropriate."⁹

Such wide latitude is extremely dangerous and gives us deep cause for concern. It appears this Administration plans to weaponize denaturalization cases to further smear innocent people and go after its perceived enemies. Indeed, it has already threatened to do so. Numerous members of the Administration, including President Trump himself, have indicated the Administration might consider pursuing, with no actual evidence, a denaturalization case against Zohran Mamdani, the Democratic nominee for the mayor of New York.¹⁰ President Trump also said that he is "giving serious consideration to taking away" the citizenship of American-born comedian and actress Rosie O'Donnell.¹¹

The Trump Administration has demonstrated over and over again its intentions to target political enemies, to subvert due process, to manufacture "evidence" to cover up lawless kidnappings and raids by ICE of immigrants of all legal statuses. After claiming to go after the "worst of the worst" immigrants who pose a threat to Americans' safety, ICE's own statistics show that 71 percent of all those who have been detained by ICE have no criminal convictions.¹² Similarly, the Administration sent hundreds of Venezuelans to a torturous gulag in El Salvador, claiming they were all dangerous members of the notorious gang, Tren de Aragua, only to see those claims fall apart under closer scrutiny – with only 6 people deported having U.S. criminal convictions for violent crimes and only 11 having foreign convictions for violent crimes.¹³ The

⁵ Jaclyn Diaz & Juliana Kim, *DOJ announces plans to prioritize cases to revoke citizenship*, NPR (Jun. 30, 2025), <https://www.npr.org/2025/06/30/nx-s1-5445398/denaturalization-trump-immigration-enforcement>.

⁶ *Id.*

⁷ Christian Penichet-Paul, *Denaturalization: Fact Sheet*, NAT'L IMMGR. FORUM (Jul. 14, 2025), <https://immigrationforum.org/article/denaturalization-fact-sheet/>.

⁸ Shumate, *supra* note 1

⁹ *Id.*

¹⁰ Robert Tait, *Trump administration raises possibility of stripping Mamdani of US citizenship*, THE GUARDIAN (Jul. 1, 2025), <https://www.theguardian.com/us-news/2025/jul/01/trump-zohran-mamdani-citizenship>.

¹¹ Ashley Ahn, Shawn McCreesh & Hamed Aleaziz, *Trump Threatens to Strip Rosie O'Donnell of U.S. Citizenship*, N.Y. TIMES (Jul. 14, 2025), <https://www.nytimes.com/2025/07/12/us/politics/trump-rosie-odonnell-citizenship.html>.

¹² Melissa Goldin, *Trump says he wants to deport 'the worst of the worst.' Government data tells another story*, ASSOC. PRESS (Jul. 12 2025), <https://apnews.com/article/fact-check-trump-immigration-crime-ice-criminal-dangerous-violent-99557d9d68642004193a9f4b7668162e>.

¹³ See, e.g. Luke Garrett, *U.S. deports hundreds of Venezuelans to El Salvador, despite court order*, NPR (Mar. 16, 2025), <https://www.npr.org/2025/03/18/nx-s1-5331857/alien-enemies-act-trump-deportations>; Charlie Savage and Julian E. Barnes, *Intelligence Assessment Said to Contradict Trump on Venezuelan Gang*, N.Y. TIMES (Mar. 20, 2025), <https://www.nytimes.com/2025/03/20/us/politics/intelligence-trump-venezuelan-gang-alien-enemies.html>;

Administration attempted to block Harvard's ability to enroll international students with no justification, only to have that effort blocked by the courts.¹⁴ The Administration is even targeting elected officials with oversight authority, claiming that multiple Democratic lawmakers, including Representative LaMonica McIver and New York Comptroller Brad Lander, as well as many everyday American citizens, assaulted ICE agents, when video evidence shows this is not true.¹⁵

Further, we are concerned that diverting law enforcement resources to focus on immigration enforcement weakens efforts to ensure Americans' public safety and national security. According to reports, cases unrelated to immigration are moving slowly or have stalled.¹⁶ At least one U.S. attorney's office halted prosecution of an individual whom prosecutors believed was dangerous simply because there was no immigration component.¹⁷

The Trump Administration's denaturalization efforts are a threat to the safety of every single American, including the roughly 24.5 million naturalized citizens as well as natural-born citizens alike. If the Administration is attacking citizens for speaking out against them, no one in this country is safe from harassment and arrest. Denaturalization undermines the very nature of what it means to be an American, creating a tiered class of citizenship that is also a slippery slope for any United States citizen. Under this denaturalization scheme, everyday Americans may be forced to carry their proof of citizenship with them to try to protect themselves. It leaves the safety, security and notion of home to the whims and vagaries of an Executive Branch that simply seeks to use its power to suppress dissent and use its power against those it does not like or agree with. Weaponizing and prioritizing denaturalization also strips resources from the real tasks at hand for the Department of Justice to protect the safety of all Americans

'Our client has been disappeared': Lawyer seeks answers on Venezuelan imprisoned with no due process, MSNBC (Mar. 21, 2025), <https://www.msnbc.com/rachel-maddow/watch/-our-client-has-been-disappeared-lawyer-seeks-answers-on-venezuelan-imprisoned-with-no-due-process-235013701978>; Philip Holsinger, *What the Venezuelans Deported to El Salvador Experienced*, TIME (Mar. 21, 2025), <https://time.com/7269604/el-salvador-photos-venezuelan-detainees>; Mica Rosenberg, et. al. *Trump administration knew most Venezuelans deported from Texas to a Salvadoran prison had no U.S. convictions*, TEXAS TRIBUNE (May 30, 2025), <https://www.texastribune.org/2025/05/30/trump-el-salvador-deportees-criminal-convictions-cecot-venezuela/>.

¹⁴ Christina Pazzanese, *Federal judge blocks Trump plan to ban international students at Harvard*, HARVARD GAZETTE (June 30, 2025), <https://news.harvard.edu/gazette/story/2025/06/federal-judge-blocks-trump-plan-to-ban-international-students-at-harvard/>.

¹⁵ Avery Lotz, *NYC comptroller, mayoral candidate released after being arrested by ICE*, AXIOS (Jun. 18, 2025), <https://www.axios.com/2025/06/17/brad-lander-nyc-comptroller-mayoral-candidate-detained>; Ry Rivard, *Rep. LaMonica McIver pleads not guilty as watchdog group files complaint against Alina Habba*, POLITICO (Jun. 25, 2025), <https://www.politico.com/news/2025/06/25/mciver-heads-to-court-as-watchdog-group-files-complaint-against-alina-habba-00422080>; Brittney Mejia, *Video shows immigration agents interrogating a Latino U.S. citizen: 'I'm American, bro!'*, LA TIMES (Jun. 13, 2025), <https://www.latimes.com/politics/story/2025-06-13/video-shows-immigration-agents-interrogating-a-latino-u-s-citizen-im-american-bro>; Joey Safchik, *ICE handcuffs 71-year-old grandmother, a U.S. citizen, at San Diego immigration court*, NBC 7 (Jul. 9, 2025), <https://www.nbcsandiego.com/news/local/ice-arrests-71-year-old-grandmother-a-us-citizen-at-san-diego-immigration-court/3865098/>.

¹⁶ Julia Ainsley, Ryan J. Reilly, et al., *A sweeping new ICE operation shows how Trump's focus on immigration is reshaping federal law enforcement*, NBC NEWS (Jun. 4, 2025) <https://www.nbcnews.com/politics/justice-department/ice-operation-trump-focus-immigration-reshape-federal-law-enforcement-rcna193494>.

¹⁷ *Id.*

Given these extraordinary circumstances, we request you provide the following information no later than X.

1. How many denaturalizations has the Department initiated since June 1 by filing either civil revocations of naturalization or criminal charges?
2. How many people have been denaturalized under this initiative thus far?
3. What is the scope of the denaturalization efforts and what databases or other information is the Department utilizing to find people to be denaturalized?
4. What guardrails have you put in place to protect the rights of individuals and ensure Americans are not wrongfully targeted?
5. What is the budget for this denaturalization efforts and how many personnel have been diverted from other important missions such as fraud and national security threats, liability claims and consumer protection?
6. Besides personnel, what other DOJ resources have been or will be diverted away from protecting the American people to focus on denaturalization instead?

Thank you for your prompt attention to this serious matter.

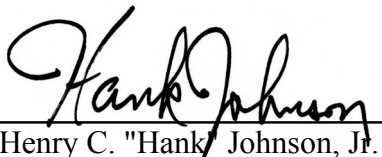
Sincerely,



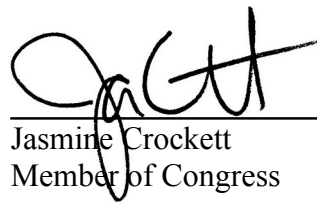
Pramila Jayapal
Ranking Member
Immigration Integrity,
Security, and Enforcement
House Judiciary Committee



Yvette D. Clarke
Member of Congress



Henry C. "Hank" Johnson, Jr.
Member of Congress



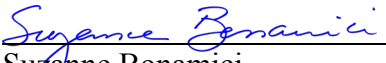
Jasmine Crockett
Member of Congress





Eleanor Holmes Norton
Member of Congress




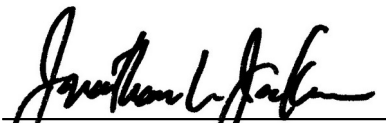
Jim Tokuda
Member of Congress



Suzanne Bonamici
Member of Congress

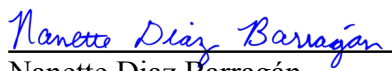

Val Hoyle
Member of Congress



Mary Gay Scanlon
Member of Congress



Sylvia R. Garcia
Member of Congress



Jonathan L. Jackson
Member of Congress


Jesús G. "Chuy" García
Member of Congress


Nanette Diaz Barragán
Member of Congress



Veronica Escobar
Member of Congress

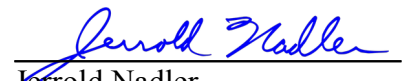

Rashida Tlaib
Member of Congress

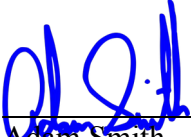

Bonnie Watson Coleman
Member of Congress


Greg Casar
Member of Congress

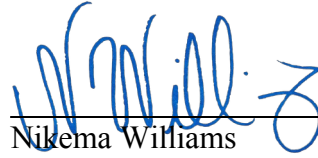

Delia C. Ramirez
Member of Congress


Summer L. Lee
Member of Congress


Jerrold Nadler
Member of Congress



Adam Smith
Member of Congress



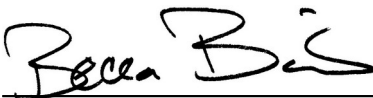
Nikema Williams
Member of Congress



James P. McGovern
Member of Congress



Yassamin Ansari
Member of Congress




Becca Balint
Member of Congress



Ted W. Lieu
Member of Congress



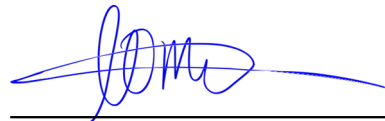
Shri Thanedar
Member of Congress



J. Luis Correa
Member of Congress



Raja Krishnamoorthi
Member of Congress



Ilhan Omar
Member of Congress



Darren Soto
Member of Congress



Deborah K. Ross
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