



CONGRESS OF THE UNITED STATES  
HOUSE OF REPRESENTATIVES

December 11, 2025

The Honorable Jim Jordan  
Chairman  
House Committee on the Judiciary  
2138 Rayburn House Building  
Washington, D.C. 20515

The Honorable Jamie Raskin  
Ranking Member  
House Committee on the Judiciary  
2142 Rayburn House Office Building  
Washington, D.C. 20515

Dear Chairman Jordan and Ranking Member Raskin,

Under Secretary Kristi Noem's leadership, the Department of Homeland Security (DHS) has done irreversible harm to our constituents, trampling the rights of all people and disregarding the rule of law. Secretary Noem has established a clear pattern of lawless behavior, mirrored in the behavior of rank and file members of her leadership team. She disregards the separation of powers, breaks the law, violates the standards of ethical behavior set for those in public office, and misuses resources appropriated by Congress. When taken together, her actions violate her oath of office.

Notably:

- Secretary Noem has misused resources appropriated by Congress and engaged in unethical behavior.
  - Recent news reports established that at least one beneficiary of DHS's wasteful \$200 million, taxpayer-funded propaganda campaign had long-standing and personal ties to the Secretary and her senior aides at DHS. The Strategy Group's involvement in the ad campaign is a clear example of money flowing from DHS to those with ties to Secretary Noem, her allies, and her friends.<sup>1</sup>
  - Secretary Noem has also exploited her position to purchase two Gulfstream private jets for \$172 million.<sup>2</sup>
  - Secretary Noem ordered a partisan video to be played in airports nationwide during the government shutdown that began on October 1, in clear violation of the Hatch Act.<sup>3</sup>
- Secretary Noem has repeatedly made false and misleading statements to Congress and to the press.

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<sup>1</sup> ProPublica, *Firm Tied to Kristi Noem Secretly Got Money From \$200 Million DHS Ad Contracts*. (November 14, 2025), <https://www.propublica.org/article/kristi-noebecausenota-andm-dhs-ad-campaign-strategy-group>.

<sup>2</sup> The New York Times, *Coast Guard Buys Two Private Jets for Noem, Costing \$172 Million* (October 18, 2025), <https://www.nytimes.com/2025/10/18/us/politics/kristi-noem-dhs-gulfstream.html>

<sup>3</sup> Associated Press, *Some airports refuse to play Noem video on shutdown impact, saying it's political* (October 14, 2025), <https://apnews.com/article/tsa-video-airports-shutdown-noem-cb6967f94f9c3949c687ddc69f03a801>

- Secretary Noem claimed that ICE and Border Patrol had not detained American citizens; however, reporting shows that at least 170 U.S. Citizens have had their rights and civil liberties violated by DHS.<sup>4</sup>
- Secretary Noem claimed that DHS could not bring back Kilmar Abrego; however, in reality they brought him back to the U.S. shortly thereafter.<sup>5</sup>
- Secretary Noem misrepresented the engagement that led to the use of excessive force on Senator Alex Padilla at a press conference.<sup>6</sup>
- Secretary Noem misrepresented the number of people with a criminal background DHS had detained; in reality, nationally, approximately 75,000 people have been detained who do not have a criminal record.<sup>7</sup>
- Secretary Noem has undermined the separation of powers and disregarded the role of Congress and the Courts.
  - After assuring on the record that DHS abides by all court orders, Secretary Noem violated court orders by not turning around deportation flights bound for El Salvador.<sup>8</sup>
  - The Secretary's rank and file have also continued to disregard court orders under her leadership. In Chicago, DHS agents have used chemical weapons at least four times, despite court orders from District Court Judge Ellis forbidding federal agents from using riot control weapons on November 6th.<sup>9</sup>

It is our responsibility as public servants charged with the Constitutional duty of oversight to ensure justice and accountability when those who hold public office violate their oath and the laws of the United States of America. As such, I call on the House Committee of the Judiciary to conduct a complete investigation into Secretary Noem's unlawful and potentially impeachable actions.

Sincerely,



Delia C. Ramirez  
Member of Congress

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<sup>4</sup> ProPublica, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days.* (October 16, 2025),

<https://www.propublica.org/article/immigration-dhs-american-citizens-arrested-detained-against-will>

<sup>5</sup> NBC News, *Kilmar Abrego Garcia has been returned to the U.S. to face federal criminal charges* (June 6, 2025), <https://www.nbcnews.com/news/us-news/kilmar-abrego-garcia-was-mistakenly-deported-el-salvador-will-face-fed-r-cna211514>

<sup>6</sup> ABC News, *Democrats condemn senator being pushed down and handcuffed at Noem press conference* (June 12, 2025), <https://abcnews.go.com/Politics/democrats-condemn-sen-alex-padillas-treatment-noem-news/story?id=122787892>

<sup>7</sup> NBC News, *ICE has arrested nearly 75,000 people with no criminal records, data shows* (December 7, 2025), <https://www.nbcnews.com/politics/immigration/ice-arrested-nearly-75000-people-no-criminal-records-data-shows-r-cna247377>

<sup>8</sup> CBS News, *Noem made decision not to turn around deportation flights bound for El Salvador after judge's order, DOJ says* (November 25, 2025), <https://www.cbsnews.com/news/noem-decision-el-salvador-deportations-trump-judge-order/>

<sup>9</sup> WTTW, *Federal Judge Imposes Strict Restrictions on Immigration Agents' Use of Force Against Protesters, Media, Clergy.* (November 6, 2025), <https://news.wttw.com/2025/11/06/federal-judge-says-border-patrol-chief-greg-bovino-lied-about-being-hit-rock-deploying>