



**global witness**

Special Counsel Robert Mueller  
Department of Justice  
Special Counsel's Office  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

November 17, 2017

Dear Special Counsel Mueller,

Please find here a report that Global Witness has released today entitled "[\*Narco-a-Lago: Money Laundering at the Trump Ocean Club, Panama.\*](#)"

The underlying investigation of this report focuses on the Trump Ocean Club International Hotel and Tower in Panama City, Panama where Donald Trump licensed his name to the project and one of his companies later managed the condominiums and hotel there. The report provides evidence of money laundering through the purchase of units at the Trump Ocean Club in its early days, including that proceeds from Colombian cartels' narcotics trafficking were laundered through the Trump Ocean Club. Donald Trump was one of the beneficiaries since his business received a cut of sales. The project was heavily marketed to buyers of Russian or Eastern European origin, who accounted for a substantial number of the early sales.

The report also examines the information available to the Trump Organization and whether Trump and his family made sufficient inquiries about the nature of the buyers and brokers at the Trump Ocean Club. The Trump Ocean Club, one of Trump's most lucrative licensing deals to date, was announced in 2006 and launched in 2011, a period when Panama was known as one of the best places in the world to launder money.

Global Witness exposes the hidden links between demand for natural resources, corruption, armed conflict and environmental destruction. We urge you to investigate these allegations and, if appropriate, hold President Trump accountable for his actions.

Should you have any questions about the report and findings, please contact Eryn Schornick, Senior Policy Advisor, Anti-Money Laundering at [eschornick@globalwitness.org](mailto:eschornick@globalwitness.org) or (202) 580 – 9711.

Thank you for your time and attention.

Sincerely,

Corinna Gilfillan  
Head of the U.S. Office  
Global Witness

cc: Federal Bureau of Investigation, Director Christopher A. Wray  
Office of the Attorney General of New York, Attorney General Eric T. Schneiderman