

Thursday, July 1, 2021

Corey R. Amundson  
Chief, Public Integrity Section  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530

Dear Chief Amundson,

On behalf of Accountable.US, a non-partisan watchdog focusing on government and corporate accountability, I write to urge an immediate criminal investigation into whether former Secretary of Agriculture Sonny Perdue violated ethics rules or ran afoul of the law involving a reported sweetheart deal between Perdue's company and one of the nation's largest agriculture corporations just weeks before he assumed his post in the Trump Administration. We are an organization that pursued countless investigations into the Trump administration and provided the foundation for the *Washington Post* story on this matter. For an administration that was the most corrupt we have seen in modern history, this case even took us aback.

On June 29th, the *Washington Post* [reported](#) that in February 2017, not long after former President Donald Trump nominated him for agriculture secretary, Perdue's company AGrowStar bought a small grain plant in South Carolina for \$250,000 from agriculture giant Archer-Daniels-Midland (ADM) "at a small fraction of its estimated value just as it stood to benefit from a friendly secretary of agriculture" --- a transaction that Accountable.US first flagged to the *Post* as highly suspect.

As the *Post* noted, the deal raises a "question of whether the secretary followed federal financial disclosure requirements to whether the transaction could have been an attempt to influence an incoming government official, in violation of bribery statutes."

With the public now learning of this serious conflict of interest and potential efforts to influence the former Secretary of Agriculture, we believe it is important to examine whether Archer-Daniels-Midland benefited from any inappropriate special treatment during Perdue's time with the Trump administration -- especially when the parties involved have a history of thumbing their noses at government regulations, including bribery statutes.

It has been well reported that during his time as Georgia governor, Perdue was found to have violated state ethics laws at least twice for refusing to put his assets in a blind trust. In addition, despite being a multi-millionaire, Perdue's companies conveniently managed to obtain at least six PPP loans worth [over \\$360,000](#) from the Trump administration; loans that were meant for struggling mom and pop businesses during the pandemic.

For ADM's part, as the *Post* reminded readers, in the late 1990s, "three ADM executives were convicted in a global price-fixing scheme and sentenced to prison terms. ADM was fined \$100 million — the largest antitrust fine in U.S. history at the time." In addition, as the *Wall Street Journal* [reported](#) in December 2013, ADM "agreed to pay more than \$36 million to settle charges under the Foreign Corrupt Practices Act that it failed to prevent bribes by its subsidiaries in Germany and Ukraine" according to the Securities and Exchange Commission.

Even to the most objective observer, the extreme low-ball purchase price Perdue's company paid to a corporation whose industry he was poised to oversee appears unseemly. In our view, the deal is the definition of corruption.

The obvious question becomes what, if anything, did Archer-Daniels-Midland receive in return for their extraordinarily generous offer to the incoming Agriculture Secretary? It's worth examining the issues ADM lobbied for, which as the Post pointed out, received serious attention from the Perdue USDA. This includes specific deregulations of the pork industry related to "line speed" that in turn were a boon to the grain industry. Then in September 2019, an ADM representative was given enough access to help broker a Congressional deal at the White House to add hundreds of millions of gallons of ethanol to the U.S. fuel supply, another windfall for the industry. But, according to the Post, the "biggest win for ADM came in the form of subsidies and tax breaks" that ADM lobbied for, and the Trump administration signed into law, which helped pad AMD's profits by at least \$270 million since 2019.

If Perdue in any way broke rules or the law to his own benefit at the expense of consumers, family farmers and rural America, he should be held accountable. If ADM benefited from a quid pro quo between their company and Perdue's former department, they too should be held responsible. Congress must get to the bottom of what appears to be clear case of a federal policy maker leveraging a public office for personal gain. Ignoring this case would only reinforce public concerns that rules and laws do not apply to the rich and powerful.

The fact remains that even a former President or a member of their cabinet are not above the law. This case demands your committee's careful scrutiny and if wrongdoing is found in the Trump Agriculture Department, all those involved must be held responsible according to the law.

Thank you for your time and consideration.

Sincerely,



Kyle Herrig

President, Accountable.US