July 21, 2026

VIA EMAIL

Mr. Jeremy London
Executive Partner
Skadden, Arps, Slate, Meagher & Flom LLP
One Manhattan West, 395 9th Avenue
New York, NY 10001

Dear Mr. London:

We write (once again) about the profoundly troubling agreement that Skadden, Arps, Slate, Meagher & Flom LLP ("Skadden") entered into with the Trump Administration to provide "pro bono and other free services" to causes chosen by the President. We have already written to your firm twice seeking documents and answers that might help the public and Congress understand Skadden's manifestly corrupt bargain with the President. To date, Skadden has provided no responsive information or records in response to our requests.[1] In light of recent revelations about your firm's apparent conflicts advising both the Intel Corporation ("Intel") and the Department of Commerce ("DOC") while the Administration snapped up a 10% equity stake in Intel, including the recent unsealing of the full Complaint in that matter, we emphasize the urgent imperative for you to fully disclose the details of your work for the federal government.

We previously sought to understand why Skadden promised $100 million in *pro bono* legal services to causes hand-picked by President Trump. We are especially troubled by reports that your firm has provided legal counsel to DOC regarding the Trump Administration's efforts to leverage unlawful tariffs into foreign trade agreements.[2] Such legal work raises a host of obvious potential issues, including potential violation of the *Antideficiency Act*, 31 U.S.C. §1342.

The response from your counsel to our last letter did not deny that Skadden has undertaken free legal work for a government agency. Instead, the firm's response simply asserted, without any further explanation, that you "do [not agree]" that any potential representations "would be contrary

[1] Letter from Richard Blumenthal, Ranking Member, S. Permanent Subcomm. on Investigations, and Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, to Jeremy London, Skadden (Apr. 6, 2025), https://www.hsgac.senate.gov/wp-content/uploads/2025-4-6-Blumenthal-Raskin-Letter-to-Skadden.pdf; Letter from Richard Blumenthal, Ranking Member, S. Permanent Subcomm. on Investigations, Adam Schiff, United States Senator, and Jamie Raskin, Ranking Member, H. Comm. on the Judiciary, to Jeremy London, Skadden (Sept. 24, 2025), https://www.hsgac.senate.gov/wp-content/uploads/2025-9-24-Letter-from-Sen.-Blumenthal-Congressman-Raskin-Sen.-Schiff-to-Skadden.pdf.

[2] Michael S. Schmidt & Maggie Haberman, *Law Firms That Settled with Trump Are Asked to Help on Trade Deals*, N.Y. TIMES (Aug. 13, 2025), https://www.nytimes.com/2025/08/13/us/politics/trump-law-firms-trade-deals.html.

to" Skadden's agreement with the Trump Administration or would constitute "violations of any statutes, regulations, or ethical standards."[3]

Recent allegations by shareholders of your client, Intel, refute this claim and renew our concerns about the President's coercion of Skadden and other law firms. In a March 5, 2026, complaint in Delaware Chancery Court, which was recently fully unsealed, shareholders sued Intel over its deal to provide the DOC with an $11 billion ownership stake (worth 9.9% of Intel's equity), alleging that this was done "for no meaningful consideration in response to extortionary threats by the government" and that "[n]o law authorizes the U.S. government to acquire stock in Intel or any publicly held company."[4]

Skadden advised Intel on this transaction—a representation that, the complaint correctly notes, presents a host of conflicts given Skadden's agreement with the Trump Administration. As the complaint explains, Intel's "Board, operating under the shadow of the President's threats, and advised by legal counsel [Skadden] that itself was conflicted due to its *pro bono* promises to the President, caved to the government's extortion."[5] According to the complaint, despite the Intel board's assessment that the "the economic terms that had been proposed [by] the Administration were not, in their current form, attractive to the Company and would need to be negotiated,"[6] "Skadden apparently never opined as to whether the Stock Agreement was lawful" before the board accepted the deal, and "[n]o evidence has been produced . . . that the Board was ever advised about or even considered Skadden's serious conflicts of interest."[7] It is hard to understand how Skadden's provision of free legal services to the Trump Administration and the allegations made in the complaint do *not* cause Skadden's attorneys to be in violation of the American Bar Association Model Rules of Professional Conduct and your fiduciary duty to Intel.

The significant allegations of ethical impropriety in the Intel shareholder complaint and your ongoing refusal to provide information and records responsive to our requests heighten our interest in understanding the details of your agreement with President Trump and any legal services Skadden has provided to the DOC or any other federal government agency. We again request all records related to your agreement with the Trump Administration, including written agreements, communications, and the information and records listed in our April 6, 2025, and September 24, 2025, letters.

This information is crucial to our work conducting oversight of the Trump Administration's outrageous and unprecedented efforts to coerce major law firms and some of the law firms' willingness to enter into unlawful agreements to provide *pro bono* work to the Administration. Our inquiry will inform potential legislative reforms of laws and regulations governing the ethical requirements of federal public officials, agencies' engagement of outside

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[3] Letter from Richard A. Sauber, Counsel to Skadden, to The Hon. Richard Blumenthal, The Hon. Jamie Raskin, & The Hon. Adam B. Schiff (Oct. 7, 2025) (attached).

[4] Compl. ¶¶ 1, 2, *Paisner v. Tan*, No. 26-cv-00414 (D. Del. May 4, 2026), *available at* https://storage.courtlistener.com/recap/gov.uscourts.ded.92754/gov.uscourts.ded.92754.21.1.pdf.

[5] *Id.* ¶ 4.

[6] *Id.* ¶ 83.

[7] *Id.* ¶ 107.

counsel, the regulation of attorneys and interstate law firms, the Antideficiency Act, and the scope of bribery laws governing pseudo-public and private deals with an Administration.

Please provide the following information by August 4, 2026:

1. All agreements made with the Trump Administration, including but not limited to, settlement records, client retainer letters, conflict disclosures, and any communications informing such agreements;

2. A list of all individuals or entities who corresponded with Skadden, or any of its agents, to discuss an agreement with the Trump Administration, including the date(s) of any and all contacts;

3. A list of all federal agencies that Skadden has performed work for, the number of hours spent working for those agencies, and the billable value of those hours; and

4. A detailed explanation of how Skadden's advising of Intel in its transaction with the Trump Administration did not constitute a violation of the Rules of Professional Conduct.

Please contact the Permanent Subcommittee on Investigations and the House Judiciary Committee should you have any questions about responding to these requests.

Sincerely,

Richard Blumenthal
United States Senator
Ranking Member, Permanent Subcommittee on Investigations

Jamie Raskin
Ranking Member
House Committee on the Judiciary

Adam B. Schiff
United States Senator

cc: The Honorable Ron Johnson
Chairman
Senate Permanent Subcommittee on Investigations

The Honorable Jim Jordan
Chairman
House Committee on the Judiciary

Mr. Richard A. Sauber
Herbert Smith Freehills Kramer (US) LLP
2000 K Street NW, 4th Floor
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Attachment

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October 7, 2025

CONFIDENTIAL

The Honorable Richard Blumenthal
The Honorable Adam B. Schiff
The Honorable Jamie Raskin

Re: Your letter to Skadden of September 24, 2025

Dear Senators and Congressman:

This is in response to your letter of September 24, 2025, addressed to Jeremy London, Executive Partner, Skadden, Arps, Slate, Meagher & Flom LLP ("Skadden" or "the Firm").

We do not agree with your characterizations of the Agreement Skadden entered with the Administration, nor do we agree with your suggestions that various representations you describe would be contrary to that Agreement or violations of any statutes, regulations, or ethical standards. The Firm's decision about client matters of all types are, and will continue to be, made in compliance with the highest ethical standards of the bar.

Respectfully submitted,

Richard A. Sauber
Counsel to Skadden