

## At Least Five Trump Nominees Have Ties To Entities Alleged To Have Perpetrated Widespread Forced Labor Or Wage Theft

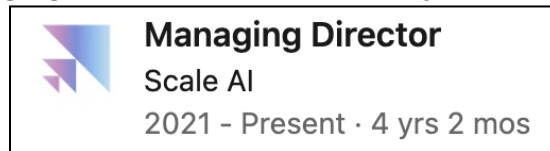
**SUMMARY:** At least five individuals nominated to key positions in the Trump Administration have ties to entities known for profiting off of widespread forced labor or wage theft:

- **U.S. Chief Technology Officer nominee Michael Kratsios** [was](#) Managing Director of **Scale AI** from 2021-2024. **Scale AI**, which helps companies refine data used to train AI language models, [employs](#) an army of low-wage workers in “digital sweatshops” throughout the developing world and has sparked alarms for “wage theft” and “widespread labor abuses.”
- **U.S. Ambassador to China nominee David Perdue** is a former CEO who [outsourced](#) numerous jobs to low-wage factories in China in the 1990s and 2000s. As CEO of **Dollar General**, Perdue and his company also [faced](#) more than 2,000 wage theft lawsuits from low-wage employees who were allegedly classified as “managers” to dodge federal regulations mandating they be paid overtime rates while reportedly working more than 70 hours per week.
- **FBI Director Kash Patel** disclosed that he [consulted](#) for the parent company of **Chinese fast fashion retailer Shein**, which has [received bipartisan outrage](#) for its use of fabrics produced with Uyghur forced labor in China’s Xinxiang Province. Patel also [consulted](#) for the **Qatari government** for an undisclosed duration of time.
- **Attorney General Pam Bondi** [worked as a lobbyist](#) for the **Embassy of Qatar**, ostensibly helping the country improve its public image and relationship with the U.S. as **Qatar** [perpetrated high-profile and widespread abuses of migrant laborers](#) employed to prepare the country to host the 2022 FIFA World Cup.
- In 2024, **EPA Administrator Lee Zeldin** [consulted for](#) **Heritage Advisors**, a **Qatari investment firm** [connected to](#) efforts to bribe former **U.S. Senator Bob Menendez** in exchange for positive statements about Qatar.

**At Least Five Trump Nominees—U.S. Chief Technology Officer Nominee Michael Kratsios, Attorney General Pam Bondi, FBI Director Kash Patel, Ambassador To China David Perdue, And EPA Administrator Lee Zeldin—Have Known Ties To Alleged Perpetrators Of Widespread Forced Labor Or Wage Theft**

**U.S. Chief Technology Officer Nominee Michael Kratsios Was Managing Director At Scale AI, An AI-Training Startup Reliant On Labor From “Digital Sweatshops” That Has Allegedly Perpetrated “Wage Theft” And “Widespread Labor Abuses”**

**President Donald Trump Nominated Former U.S. Chief Technology Officer Michael Kratsios To Again Lead The White House Office Of Science And Technology Policy.** “The White House sent Michael Kratsios’s nomination to direct the White House Office of Science and Technology Policy to the Senate on Wednesday, formally beginning his confirmation process. Kratsios was chief technology officer during the first Trump administration and was most recently managing director at Scale AI, a technology company and defense contractor focused on AI model training data.” [Fedscoop, [1/22/25](#)]



[Michael Kratsios via LinkedIn, accessed [2/25/25](#)]

**Scale AI Is A “Major Player In The Field Of Generative Artificial Intelligence” That Manages A “Sprawling” Freelance Workforce That Refines Data Used To Train AI Language Models.** “Kratsios is a managing director at Scale AI, a major player in the field of generative artificial intelligence. The company manages a sprawling workforce of freelance contractors who label, annotate, and refine data that’s foundational to the large language models developed by industry giants such as Meta, OpenAI, Google, and the U.S. Department of Defense.” [Inc., [11/12/24](#)]

- **Scale AI Was Valued At \$13.8 Billion As Of May 2024.** “The company has been valued at \$13.8 billion since May, when it welcomed a \$1-billion venture investment from Founders Fund, Accel, and other investors.” [Inc., [11/12/24](#)]

**For Its Labor, Scale AI Has Depended On “Digital Sweatshops” In Southeast Asia, The “Vast Underbelly” Of The AI Industry.** “Behind the AI boom, an army of overseas workers in ‘digital sweatshops’... More than 2 million people in the Philippines perform this type of “crowdwork,” according to informal government estimates, as part of AI’s vast underbelly.” [The Washington Post, [8/8/23](#)]

**Scale AI Has Reportedly “Paid Workers At Extremely Low Rates, Routinely Delayed Or Withheld Payments And Provided Few Channels For Workers To Seek Recourse,” Violating “Basic Labor Standards” And Generating Alarm From Human Rights Groups.** “Scale AI has paid workers at extremely low rates, routinely delayed or withheld payments and provided few channels for workers to seek recourse, according to interviews with workers, internal company messages and payment records, and financial statements. Rights groups and labor researchers say Scale AI is among a number of American AI companies that have not abided by basic labor standards for their workers abroad.” [The Washington Post, [8/8/23](#)]

**Following Michael Kratsios’ Nomination To Be U.S. Chief Technology Officer, A Group Of Former Scale AI Contractors Implored Senators To Express Concern For Kratsios’ Nomination And Called For An Investigation Into Scale AI For Issues Of “Wage Theft” And “Widespread Labor Abuses.”** “A group of 45 former and current Scale AI contractors have written to senators on the Committee on Commerce, Science and Transportation, detailing a multitude of complaints from their time working at the unicorn data-labeling startup. The email, addressed to the committee’s ranking member, Senator Maria Cantwell (D-Wash.), warns officials about the growing prominence of a startup situated at the heart of the commercial AI revolution. The former contractors call for a Department of Labor investigation into Scale for what they describe as a history of ‘wage theft’ and ‘widespread labor abuses,’ as the company continues to compete for lucrative contracts with the Department of Defense.” [Inc., [2/24/25](#)]

**David Perdue, Trump’s Nominee For Ambassador To China, Faced More Than 2,000 Wage Theft Lawsuits As CEO Of Dollar General After The Company Reportedly Reclassified Low Wage Workers As “Managers” To Dodge A Federal Law Mandating Overtime Pay—And Outsourced Labor To Sweat Shops In China And Southeast Asia As An Executive At Several Companies**

**President Donald Trump Nominated Former Georgia Senator And Business Executive David Perdue To Be U.S. Ambassador To China.** “President-elect Donald Trump has named former Georgia Senator David Perdue to become ambassador to China, a key role for how the US deals with one of its biggest global rivals...

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Prior to getting involved in politics, he was a high-level executive at Dollar General, Reebok and other firms.” [BBC, [12/6/24](#)]

- **Prior To Working In Politics, Perdue Was The CEO Of Dollar General, Reebok, And Pillowtex, The Last Of Which Went Bankrupt Following His Leadership.** “Perdue is the former CEO of Dollar General, Reebok and Pillowtex. Michelle Nunn, Perdue’s Democratic opponent, has been hammering him on his stewardship of Pillowtex. He began there in 2002 in an effort to help turn around the struggling company, which had just come out of bankruptcy. The company’s finances were further complicated after he arrived, however, when he and other managers found ‘between \$40-\$50 million in pension liabilities missed in bankruptcy proceedings.’ Perdue left in 2003, and four months later, Pillowtex shut down.” [HuffPost, [12/6/14](#)]

**David Perdue’s Tenure As CEO Of Dollar General Was Defined By “Rampant Wage Theft,” With Managers Filing More Than 2,000 Wage Theft Cases In 2006.** “Dollar General, which he ran between 2003 and 2007, rests on a business model of offering low-cost goods at rock-bottom prices while paying workers poorly... Perdue presided over a more than 30-fold increase in the number of employee lawsuits filed against the company, according to a Capital & Main review of court filings. While he worked at the firm, 2,494 individual employment cases were filed charging the company with gender and racial discrimination, rampant wage theft, failure to provide medical leave and other workplace violations. In the four years leading up to Perdue taking the helm, 76 employment cases were filed in federal court. That vast increase appears largely due to more than 2,000 wage theft cases filed in 2006 by Dollar General managers who claimed they were classified as managers only so that the company could circumvent federal law, which required hourly employees to be paid overtime when working over 40 hours in a single week, according to the employees’ complaints.” [Newsweek, [12/30/20](#)]

- **The Plaintiffs Of These Lawsuits Were Employees “Classified As Managers Only So That The Company Could Circumvent Federal Law” Requiring Them To Be Fairly Compensated For Overtime Work.** “In the four years leading up to Perdue taking the helm, 76 employment cases were filed in federal court. That vast increase appears largely due to more than 2,000 wage theft cases filed in 2006 by Dollar General managers who claimed they were classified as managers only so that the company could circumvent federal law, which required hourly employees to be paid overtime when working over 40 hours in a single week, according to the employees’ complaints. In an effort to keep their store’s payroll low, these ‘managers’ were allegedly forced to work more than 70 hours a week, and sometimes up to 90 hours a week, without earning overtime, despite doing much the same work as hourly employees.” [Newsweek, [12/30/20](#)]
- **So-Called “Managers” Were Allegedly Forced To Work More Than 70 Hours Weekly Without Earning Overtime, Despite Doing The Same Work As Hourly Employees.** “In an effort to keep their store’s payroll low, these ‘managers’ were allegedly forced to work more than 70 hours a week, and sometimes up to 90 hours a week, without earning overtime, despite doing much the same work as hourly employees.” [Newsweek, [12/30/20](#)]

**Dollar General Was Also Sued For Putting “Extraordinary Pressure On Its Workforce” In A Manner That Allegedly “[Limited] Opportunity For Black And Women Employees.”** “Taken together, the lawsuits filed during Perdue’s tenure paint a portrait of a chain that is alleged to have put extraordinary pressure on its workforce, and that is alleged to have operated in such a way to limit opportunity for Black and women employees.” [Newsweek, [12/30/20](#)]

**As An Executive Of Reebok, Fashion Retailer Sara Lee, And Dollar General, David Perdue Was Reportedly “Involved In The Shift Of Manufacturing, And Jobs, To Low-Wage Factories In China And Other Asian Companies.”** “The man who has lately voiced support for some of President Trump’s signature tariffs built his career as an unapologetic, free-trading practitioner of the outsourcing arts. As a top executive at companies including Reebok, Sara Lee and Dollar General, [David Perdue] was often deeply involved in the

shift of manufacturing, and jobs, to low-wage factories in China and other Asian countries.” [The New York Times, [1/1/21](#)]

## **FBI Director Kash Patel Received Between \$1-5 Million As Compensation For Consulting For The Parent Company Of Fast Fashion Retailer Shein, Known For Sourcing Fabrics Produced Using Uyghur Forced Labor, And Provided Unspecified Consulting Services For The Qatari Government In 2024**

*FBI Director Kash Patel Has Financial Ties To Chinese Fast Fashion Retailer Shein, Whose Reported Sourcing Of Forced Uyghur Labor From China’s Xinxiang Province Has Sparked Bipartisan Alarm Among U.S. Lawmakers.*

**February 2025: Trump Loyalist Kash Patel Was Confirmed As FBI Director.** “The Senate on Thursday narrowly voted to confirm Kash Patel as director of the FBI, moving to place him atop the nation’s premier federal law enforcement agency despite doubts from Democrats about his qualifications and concerns he will do Donald Trump’s bidding and go after the Republican president’s adversaries.” [The Associated Press, [2/20/25](#)]

**Kash Patel Reportedly Consulted For Shein’s Parent Company, Elite Depot, For Nine Months In 2024 And Received Between \$1-5 Million In Stock As Compensation.** “Among the winners will be Kash Patel, the confidant of President Trump picked to run the Federal Bureau of Investigation. Patel consulted for Shein’s parent company, Elite Depot, for nine months last year and was compensated with stock valued at between \$1 million and \$5 million, according to a financial disclosure report he filed this year.” [The Wall Street Journal, [2/20/25](#)]

- **As Of February 2025, Shein Was Set To Go Public On The Stock Market In 2025, With Stockholders Set To Cash Out.** “When the China-founded fashion company Shein goes public as soon as this year, it will mint billionaires and millionaires out of those fortunate enough to get shares early in the trendy retailer.” [The Wall Street Journal, [2/20/25](#)]

**April 2023: A U.S.-China Economic And Security Review Commission Brief Found Shein Used Cotton From Xinjiang, Violating The Uyghur Forced Labor Prevention Act, And Had Reports Of Illegal Labor Conditions.** “Numerous controversial practices have supported Shein and other Chinese e-commerce firms’ rapid growth. Investigations in 2022 alleged that Shein failed to declare that it had sourced cotton from Xinjiang for its products, a violation of the Uyghur Forced Labor Prevention Act. These claims are exacerbated by further reports of illegal labor conditions among the suppliers of Chinese fast fashion firms as well as findings that Shein products pose health hazards and environmental risks. Shein and several other Chinese fast fashion firms have also faced a high volume of copyright infringement accusations and lawsuits for intellectual property (IP) rights violations.” [US-China Economic And Security Review Commission, Issue Brief, [4/14/23](#)]

- **The Brief Found That Shein Presented “A Range Of Challenges To U.S. Interests.”** “Shein and similar companies present a range of challenges to U.S. interests, including difficulties monitoring supply sources and obstacles in ensuring fair market practices with U.S. competitors. These companies also exploit trade de minimis import exemptions, through which firms make shipments to the United States that are below an \$800 value and are therefore not subject to import duties. Taken together, Shein and similar firms serve as a case study of Chinese e-commerce platforms outmaneuvering regulators to grow a dominant U.S. market presence.” [US-China Economic And Security Review Commission, Issue Brief, [4/14/23](#)]

**February 2025: The U.S. Was Reportedly Discussing Whether To Add Shein To The Department Of Homeland Security’s “Forced Labor” List.** “The U.S. is discussing whether to add Chinese ecommerce retailers Shein and Temu to the Department of Homeland Security’s (DHS) ‘forced labor’ list, Semafor reported

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on Tuesday. The Trump administration has not made a final decision on the matter and could ultimately decide not to list either, the report said, citing two sources familiar with the discussions.” [Reuters, [2/5/25](#)]

**February 2023: Sen. Bill Cassidy Called On Shein To Increase The Transparency Of Their Supply Chains Following Reports The Company Used Cotton From Chinese Slavor Labor.** “U.S. Senators Bill Cassidy, M.D. (R-LA), Elizabeth Warren (D-MA), and Sheldon Whitehouse (D-RI) pressed the Chinese fast fashion company SHEIN for answers following reports that their products are made with cotton from Chinese slave labor. They called on SHEIN to increase transparency on their supply chains.” [Senator Bill Cassidy Press Release, [2/9/23](#)]

**May 2023: A Bipartisan Group Of Members Of Congress Asked The SEC To Require That Shein Certify That Their Products Did Not Use Uyghur Forced Labor.** “US Congress is stepping up the pressure on Chinese fast-fashion giant Shein. In a letter to the Securities and Exchange Commission Monday, a bipartisan group of 22 US House of Representatives members asked the SEC to require that Shein certify that any of its products that are made in China do not utilize Uyghur forced labor. ‘There are credible allegations of the company’s use of underpaid and forced labor in the Xinjiang Uyghur Autonomous Region,’ said the letter, led by Reps. John Rose of Tennessee and Jennifer Wexton of Virginia.” [CNN, [5/2/23](#)]

**February 2024: Sen. Marco Rubio (R-FL) Asked The SEC To Block Shein’s New York IPO Unless The Company Made Additional Disclosures Due To Business Risks.** “Republican Senator Marco Rubio asked the U.S. Securities and Exchange Commission to block Shein’s bid to list publicly in New York unless the e-tailer makes additional disclosures about its business operations and ‘the serious risks of doing business’ in China. In a letter sent Thursday to SEC Chair Gary Gensler, seen exclusively by Reuters, Rubio wrote that Shein’s recent decision to request approval from Beijing for a prospective U.S. IPO ‘raises serious doubts’ about the accuracy of the company’s filings. New rules passed by China’s securities watchdog in 2023 allow the China Securities Regulatory Commission to vet offshore listings and block offerings that could threaten the country’s national interests.” [Reuters, [2/15/24](#)]

- **November 2023: Rubio Said “Shein Is Fundamentally A Chinese Company That Evades U.S. Customs Law And Has Links To Slave Labor” And Called Investors To Take A Closer Look At Its Business Practices.**



[X, @SenMarcoRubio, [11/28/23](#)]

**July 2024: Senator Tom Cotton (R-AR) Sent A Letter To President Biden Describing His Concerns About Shein.** “Senator Tom Cotton described new supply-chain tracking software from shopping site Shein as ‘potentially fraudulent’ and likely to funnel data from U.S. firms to the Chinese government. He described these concerns about the popular fast-fashion company in a letter yesterday to President Biden, an exclusive copy of

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which National Review has obtained. ‘Your administration must ensure that data from U.S. companies is not harvested by the Chinese Communist Party (CCP) through the purchase of Shein software and technology,’ he wrote.” [National Review, [7/11/24](#)]

*Kash Patel Disclosed That He Consulted For The Embassy Of Qatar For An Undisclosed Amount Of Time Ending In 2024, Supporting A Country Known For Its Rampant Exploitation Of Migrant Workers.*

**Following His Nomination To Be FBI Director, Kash Patel Disclosed That He Had Consulted For The Embassy Of Qatar For An Undisclosed Length Of Time Concluding In November 2024.**

### SECTION 10 – EMBASSY OF QATAR

I provided consulting services for the Embassy of Qatar which ended in November 2024. For a period of one year after the date that consulting relationship ended in November 2024, I will have a “covered relationship” under the impartiality regulation at 5 C.F.R. § 2635.502 with the country of Qatar. Pursuant to 5 C.F.R. § 2635.502(d), the agency will grant me a written authorization to participate personally and substantially in particular matters involving specific parties in which I know the country of Qatar is a party or represents a party. Until such an authorization is granted, I will recuse pursuant to the impartiality regulation at 5 C.F.R. § 2635.502 for a period of one year after my resignation.

[Office of Government Ethics, “Ethics Agreement” submitted by Kashyap Patel, [1/28/25](#)]

- **Patel Reportedly Did Not Register As A Foreign Agent Or Disclose His Work For The Embassy Of Qatar In The FARA Database Or To Senators In His Senate Nominee Questionnaire.** “Mr. Patel did not register as a foreign agent and disclose this work for the Embassy of Qatar in the FARA database and did not disclose this work to Senators on his Senate Nominee Questionnaire.” [Public Citizen, [2/4/25](#)]

**The Qatari Government Perpetrated Widespread And Well-Documented Abuse And Exploitation Of Low Paid Migrant Workers, “Sometimes Amounting To Forced Labor And Human Trafficking,” In Efforts To Construct Infrastructure For The 2022 World Cup.** “The abuse and exploitation of low paid migrant workers, sometimes amounting to forced labour and human trafficking, have been extensively documented since the World Cup was awarded to Qatar. In October 2013, for example, The Guardian reported that 44 Nepali workers had died in Qatar in just a two-month period, while Amnesty International reports in 2013 and 2016 documented large scale labour abuse in the construction sector, including forced labour, such as at Doha’s Khalifa Stadium. In 2014 the UN Special Rapporteur on Migrant Rights also described how “exploitation is frequent and migrants often work without pay and live in substandard conditions”, and called for the country’s sponsorship system to be abolished.” [Amnesty International, [2/5/19](#)]

## **Attorney General Pam Bondi Lobbied On Behalf Of The Qatari Government In 2019-2020 Amid Widespread Abuses Perpetrated Against Migrant Laborers In Efforts To Construct Infrastructure For The 2022 FIFA World Cup**

**February 2025: Pam Bondi Was Confirmed As U.S. Attorney General Under The Trump Administration.** “The Senate has voted to confirm Pam Bondi to serve as U.S. attorney general, elevating a longtime defender of President Trump to lead the Justice Department and oversee the more than 100,000 who work for it and its component agencies — including the FBI.” [NPR, [2/5/25](#)]

**Pam Bondi Lobbied On Behalf Of The Embassy Of Qatar From July 2019-June 2020, For Which Her Firm Collected \$115,000 Monthly.**

CONSULTING SERVICES AGREEMENT  
AMENDMENT ONE

THIS AMENDMENT ONE shall amend that certain Consulting Services Agreement dated June 28, 2018 by and between the Embassy of the State of Qatar ("Embassy") and Ballard Partners ("Consultant").

In consideration of the mutual promises set forth herein, the Embassy and Consultant agree to amend the Consulting Services Agreement, as follows:

1. The Term of the Agreement shall commence on July 1, 2019 (the "Effective Date"), and shall expire on COB June 30, 2020, unless earlier terminated in accordance with the Agreement.

2. Appendix A is amended by adding the following:

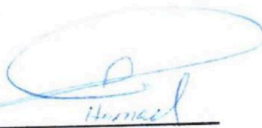
"Additionally, the Consultant shall provide consulting and advocacy services regarding matters involving anti-human trafficking.

The following Consultant personnel shall be designated "Key Personnel": Ms. Pam Bondi and Mr. James Rubin. Key Personnel shall be personally and substantially engaged in the delivery of the Services."

3. Appendix B is amended to modify the consulting fee to US \$ 115,000 per month.

Except as expressly stated herein, nothing in this Amendment One shall alter or amend the terms of the Consulting Services Agreement.

IN WITNESS WHEREOF, Embassy and Consultant have executed this Agreement by their duly authorized representatives.

By:   
Embassy

By:   
Consultant

Date: July 17, 2019



[Michael Tracey via X, [11/21/24](#)]

- **Pam Bondi Lobbied On Behalf Of Qatar As The Country Faced International Scrutiny Over Its "Abusive" Treatment Of Migrant Laborers In The Run Up To The 2022 World Cup.** "President-elect Donald Trump's new pick for Attorney General once earned \$115,000 a month as a registered foreign lobbyist for the Qatari government, which has often been accused of human rights abuses. She worked for Qatar in 2020 during the run-up to the 2022 soccer World Cup, when the state introduced new laws to end one of the most abusive elements of the country's labor system." [[11/22/24](#)]
- **Bondi Was Reportedly Tasked With "Providing Advice, Counsel, And Other Assistance With Respect To Efforts To Combat Human Trafficking."** "Department of Justice documents also show she was tasked with 'providing advice, counsel, and other assistance with respect to efforts to combat human trafficking.'" [Newsweek, [11/22/24](#)]

**The Qatari Government Perpetrated Widespread And Well-Documented Abuse And Exploitation Of Low Paid Migrant Workers, "Sometimes Amounting To Forced Labor And Human Trafficking," In Efforts To Construct Infrastructure For The 2022 World Cup.** "The abuse and exploitation of low paid migrant workers, sometimes amounting to forced labour and human trafficking, have been extensively documented since the

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World Cup was awarded to Qatar. In October 2013, for example, The Guardian reported that 44 Nepali workers had died in Qatar in just a two-month period, while Amnesty International reports in 2013 and 2016 documented large scale labour abuse in the construction sector, including forced labour, such as at Doha's Khalifa Stadium. In 2014 the UN Special Rapporteur on Migrant Rights also described how "exploitation is frequent and migrants often work without pay and live in substandard conditions", and called for the country's sponsorship system to be abolished." [Amnesty International, [2/5/19](#)]

- **Qatar Constructed Seven Brand New Stadiums, An Airport, Metro System, And Numerous Roads And Hotels In Preparation For The World Cup, Using Workers Largely Recruited From South And Southeast Asia.** "Qatar has built seven stadiums for the World Cup finals as well as a new airport, metro system, series of roads and about 100 new hotels. An entire city has been constructed around the stadium which will host the final match. Qatar's government says that 30,000 foreign labourers were hired just to build the stadiums. Most come from Bangladesh, India, Nepal and the Philippines." [BBC, [11/9/22](#)]
- **An Analysis By The Guardian Found That At Least 6,500 Migrant Workers From India, Pakistan, Nepal, Bangladesh, And Sri Lanka Died In Qatar Between 2010-2020, With The Actual Death Toll Likely Being "Significantly Higher."** "More than 6,500 migrant workers from India, Pakistan, Nepal, Bangladesh and Sri Lanka have died in Qatar since it won the right to host the World Cup 10 years ago, the Guardian can reveal... The total death toll is significantly higher, as these figures do not include deaths from a number of countries which send large numbers of workers to Qatar, including the Philippines and Kenya." [The Guardian, [2/23/21](#)]
- **Migrant Laborers In Qatar Reportedly Saw Widespread Issues With Forced Labor Stemming From Wage Theft And Passport Confiscation, Typically Without Legal Representation.** "The Gulf Nation moved to reform its labor system on paper, but the reality on the ground remains stark as Amos's story and that of countless other migrant workers illustrate. In Qatar, migrant workers often find themselves in a vulnerable position to protest against passport confiscation, wage theft, and employers' demand for a no objection certificate (NOC). They rarely get legal representation." [Forbes, [2/29/24](#)]
- **Migrant Workers Qatar Employed As Security Guards Were Also "Subjected To Serious Labour Abuses Including Forced Labour."** "Despite important labour reforms of the kafala sponsorship system since 2017, migrant workers across Qatar's private security sector continue to be subjected to serious labour abuses including forced labour. The accounts of the security guards and safety officers interviewed by Amnesty International reveal a wide range of abuse and exploitation taking place in eight private security companies. These include excessive working hours, lack of rest days, and arbitrary or disproportionate financial penalties, as well as underpayment of overtime work, potentially dangerous working conditions, substandard living conditions and discrimination on the basis of race, nationality, and language." [Amnesty International, [4/7/22](#)]

## In 2024, EPA Administrator Lee Zeldin Consulted "Heritage Advisors," A Qatari Investment Management Firm That Was Reportedly Connected To Efforts To Bribe Former U.S. Sen. Bob Menendez In Exchange For Public Statements Praising Qatar

**January 2025: Former New York Congressman Lee Zeldin Was Confirmed As Environmental Protection Agency (EPA) Administrator.** "The Republican-controlled Senate on Wednesday confirmed Lee Zeldin to lead the Environmental Protection Agency, a key role to help President Donald Trump fulfill his pledge to roll back major environmental regulations, including those aimed at slowing climate change and encouraging use of electric vehicles... Zeldin, a former Republican congressman from New York, is a longtime Trump ally and served on Trump's defense team during his first impeachment. He voted against certifying Trump's 2020 election loss to President Joe Biden." [The Associated Press, [1/29/25](#)]



**Lee Zeldin Disclosed That He Consulted For A London-Based “Heritage Advisors” In 2024, For Which He Received Compensation Exceeding \$5,000.**

## 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
15	Heritage Advisors	London, Outside U.S.	Consulting (Client of Zeldin Strategies)

[...]

[Office of Government Ethics, Lee Zeldin, Form 278, [1/11/25](#)]

**Heritage Advisors Is A London-Based “Investment Management Firm” That Manages The International Investment Portfolio Of Sheikh Sultan Bin Jassim Al Thani, A Member Of The Qatari Royal Family.** ““His Excellency Sheikh Sultan bin Jassim Al Thani established Heritage Advisors as an independent investment management firm to manage his international investment portfolio. Before stepping back from day-to-day management responsibilities, H.E. Sheikh Sultan had a long and successful business career in Qatar spanning over three decades. This resulted in him ultimately taking over as Group CEO of the holding company for his family business interests within the emirate... Heritage Advisors Limited, 13A St George Street, London, W1S 2FQ.” [Heritage Advisors, accessed [2/25/25](#)]

- **Sheikh Sultan Bin Jassim Al Thani Has Held A Number Of Senior Roles In The Qatari Government, Including Being Appointed Founding Chair Of The Qatar Tourism Authority.** “His Excellency was responsible for operations across a diverse field of sectors including, oilfield services, speciality chemicals, infrastructure, commodity trading, and real estate development. H.E. Sheikh Sultan began his career in public administration, holding a series of senior finance-focused roles within Qatar's Ministry of Finance & Petroleum in the 1990s, before moving to work for the Deputy Prime Minister's office. Sheikh Sultan was subsequently appointed as the founding chair of Qatar Tourism Authority.” [Heritage Advisors, accessed [2/25/25](#)]

**Heritage Advisors Was Reportedly At The Heart Of Qatari Efforts To Bribe Former U.S. Senator Bob Menendez In Exchange For Political Favors.** “When Senator Robert Menendez arrived in Qatar in 2022 to attend the country’s lavish production of the men’s soccer World Cup, he gave an unusual interview to the authoritarian government’s news agency praising the progress that Qatar had made on labor rights... In the updated indictment, prosecutors accused Mr. Menendez of using his influence and connections — a byproduct of his powerful position as the chairman of the Senate Foreign Relations Committee — to help a New Jersey developer get financial backing from an investment fund run by a Qatari royal family member in exchange for lucrative bribes. To help win over the Qataris, prosecutors said, the developer, Fred Daibes, also expected Mr. Menendez to ‘take action to benefit the government of Qatar’... The indictment does not name the Qatari investor, the Qatari investment company, or the Qatari government official. But deed records in Bergen County, New Jersey, show that in 2023, a London-based company entered into a \$45 million shared-ownership agreement for a New Jersey real estate project with Mr. Daibes. That company — Heritage Advisors — was founded by a member of Qatar’s royal family, Sheikh Sultan bin Jassim Al Thani.” [The New York Times, [1/3/24](#)]

- **Menendez Reportedly Praised Qatar At The Behest Of Fred Daibes, A Real Estate Developer Who Was Bribing Menendez.** “Federal prosecutors said Menendez, once a leader of the Foreign Relations Committee, praised Qatar to help a developer friend who was bribing him and was trying to do a major deal with Heritage Advisors... Prosecutors at Menendez’s trial said the Democratic senator had spoken kindly of Qatar to help real estate developer Fred Daibes — who was convicted last year of bribing Menendez among other charges — secure Heritage Advisors as an investor after a China-based backer pulled out of the project, a series of waterfront high rises across the river from Manhattan.” [Politico, [1/22/25](#)]
- **Menendez Reportedly Praised Qatar To Help Daibes Secure A Multimillion-Dollar Real Estate Investment Deal With Heritage Advisors.** “To help win over the Qataris, prosecutors said, the

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developer, Fred Daibes, also expected Mr. Menendez to ‘take action to benefit the government of Qatar’... The indictment does not name the Qatari investor, the Qatari investment company, or the Qatari government official. But deed records in Bergen County, New Jersey, show that in 2023, a London-based company entered into a \$45 million shared-ownership agreement for a New Jersey real estate project with Mr. Daibes.” [The New York Times, [1/3/24](#)]

- **Menendez Resigned From The Senate Following Bribery Convictions.** “New Jersey Sen. Bob Menendez’s Senate career came to a close Tuesday, capping roughly five decades in Democratic politics that took him from the local school board to chair of the influential Senate Foreign Relations Committee, just over a month after a jury convicted him on federal bribery charges.” [The Associated Press, [8/20/24](#)]

**The Qatari Government Perpetrated Widespread And Well-Documented Abuse And Exploitation Of Low Paid Migrant Workers, “Sometimes Amounting To Forced Labor And Human Trafficking,” In Efforts To Construct Infrastructure For The 2022 World Cup.** “The abuse and exploitation of low paid migrant workers, sometimes amounting to forced labour and human trafficking, have been extensively documented since the World Cup was awarded to Qatar. In October 2013, for example, The Guardian reported that 44 Nepali workers had died in Qatar in just a two-month period, while Amnesty International reports in 2013 and 2016 documented large scale labour abuse in the construction sector, including forced labour, such as at Doha’s Khalifa Stadium. In 2014 the UN Special Rapporteur on Migrant Rights also described how “exploitation is frequent and migrants often work without pay and live in substandard conditions”, and called for the country’s sponsorship system to be abolished.” [Amnesty International, [2/5/19](#)]

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