

MIKE CRAPO, IDAHO, CHAIRMAN

CHUCK GRASSLEY, IOWA
JOHN CORNYN, TEXAS
JOHN THUNE, SOUTH DAKOTA
TIM SCOTT, SOUTH CAROLINA
BILL CASSIDY, LOUISIANA
JAMES LANKFORD, OKLAHOMA
STEVE DAINES, MONTANA
TODD YOUNG, INDIANA
JOHN BARRASSO, WYOMING
RON JOHNSON, WISCONSIN
THOM TILLIS, NORTH CAROLINA
MARSHA BLACKBURN, TENNESSEE
ROGER MARSHALL, KANSAS

RON WYDEN, OREGON
MARIA CANTWELL, WASHINGTON
MICHAEL F. BENNET, COLORADO
MARK R. WARNER, VIRGINIA
SHELDON WHITEHOUSE, RHODE ISLAND
MAGGIE HASSAN, NEW HAMPSHIRE
CATHERINE CORTEZ MASTO, NEVADA
ELIZABETH WARREN, MASSACHUSETTS
BERNARD SANDERS, VERMONT
TINA SMITH, MINNESOTA
BEN RAY LUJÁN, NEW MEXICO
RAPHAEL G. WARNOCK, GEORGIA
PETER WELCH, VERMONT

United States Senate

COMMITTEE ON FINANCE

WASHINGTON, DC 20510-6200

GREGG RICHARD, STAFF DIRECTOR
JOSHUA SHEINKMAN, DEMOCRATIC STAFF DIRECTOR

April 1, 2026

The Honorable Scott Bessent
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Ave. NW
Washington, D.C.

Dear Secretary Bessent:

I write to request information regarding the Department's treatment of Turkish state-owned bank Türkiye Halk Bankası A.S. (Halkbank) as part of my ongoing investigation into trade-based money laundering, the integrity of correspondent banking services, and the application of U.S. economic sanctions. I seek to understand whether political interference influenced the Department of Justice's prosecution of Halkbank.

Halkbank was indicted in the United States for partaking in a multi-billion dollar effort to aid Iran in circumventing U.S. sanctions.¹ Halkbank officials admitted to conspiring to evade sanctions and funnel Iranian oil profits back to the country through complex gold purchases disguised as money transfers.² As part of that scheme, at least \$1 billion in funds from Iranian oil proceeds are alleged to have been transferred through correspondent banking services at U.S. financial institutions.³ Last month, the DOJ prosecution of Halkbank was paused after the bank and DOJ agreed to a deferred prosecution agreement that would not require the bank to admit to any criminal wrongdoing or pay any fines.⁴ This favorable agreement, which still needs to be

¹ *Turkish Bank Charged in Manhattan Federal Court for its Participation in a Multibillion-Dollar Iranian Sanctions Evasion Scheme*, Department of Justice, Oct. 15, 2019, <https://www.justice.gov/usao-sdny/pr/turkish-bank-charged-manhattan-federal-court-its-participation-multibillion-dollar>

² *U.S. Indicts Turkish Bank on Charges of Evading Iran Sanctions*, New York Times, Oct. 15, 2019; <https://www.nytimes.com/2019/10/15/us/politics/halkbank-turkey-iran-indictment.html>.

³ *Turkey's Halkbank Urges Dismissal of Iran Sanctions Criminal Case in U.S.*, Reuters, Sep. 18, 2020; <https://www.reuters.com/article/us-usa-turkey-halkbank/turkeys-halkbank-urges-dismissal-of-iran-sanctions-criminal-case-in-u-s-idUSKBN2692FF>.

⁴ *Judge has limited role in resolving US Halkbank criminal case, prosecutor says*, Reuters, Mar. 11, 2026; <https://www.reuters.com/world/middle-east/judge-weigh-halkbank-us-prosecutors-resolution-criminal-case-2026-03-11/>.

approved by the court, comes as Iran and its proxies terrorize the Middle East and threaten Americans at home.⁵ That this Administration has chosen to wage war on the Iranian regime, while at the same time abandoning prosecution of an entity that materially aided that same regime is nothing short of rank incompetence.

As you are aware, the Treasury Department plays a critical role in the enforcement of U.S. sanctions laws, including sanctions on the Government of Iran and those who act on its behalf. The Department also plays a leading role in ensuring the U.S. financial system is not used to facilitate money laundering or the financing of terrorism. As the Chairman and ranking Democrat of the Senate Committee on Finance, I have been investigating, among other things, whether former Treasury Secretary Steven Mnuchin was directed by President Trump to improperly intervene in a criminal investigation into the evasion of sanctions in response to a pressure campaign by the Turkish government.⁶

In a November 20, 2019 letter, Treasury Department officials corroborated several key facts relevant to my investigation. First, Treasury officials acknowledged that after Turkish President Recep Tayyip Erdogan personally raised the Halkbank case directly with President Trump, the President referred the issue to the Treasury Department and the Department of Justice.⁷ At the time, Halkbank had not yet faced a criminal indictment in the United States and the Turkish government was actively lobbying the Administration to avoid prosecution and heavy fines. Second, Treasury officials identified seven meetings between Secretary Mnuchin and senior Turkish officials, despite the Secretary's admitted "integral" role in the enforcement of U.S. sanctions generally, and the prosecution of Halkbank specifically.⁸ Most concerning was an April 15, 2019 Oval Office meeting between President Trump, Secretary Mnuchin, Trump's son-in-law Jared Kushner and President Erdogan's son-in-law and Finance Minister, Berat Albayrak. This was the second meeting Secretary Mnuchin held with Albayrak in 3 days, and appears to coincide with the Trump administration's admitted interference in the Halkbank prosecution. Even more troubling, the President, Treasury Secretary Mnuchin, and the President's son-in-law held the April 15, 2019 White House meeting despite the fact that Albayrak and Erdogan have been personally implicated in the Halkbank scheme by federal prosecutors.⁹

⁵ Iran's threats on U.S. soil: sleeper cells, lone wolves, cyberattacks and eerie numbers code, LA Times, Mar. 10, 2026; <https://www.latimes.com/california/story/2026-03-10/irans-threat-on-u-s-soil-sleeper-cells-lone-wolves-cyberattacks>.

⁶ Wyden Launches Investigation Into Halkbank Scandal, Press Release, Oct. 24, 2019; <https://www.finance.senate.gov/ranking-members-news/wyden-launches-investigation-into-halkbank-scandal>.

⁷ Letter to Ranking Member Wyden from Frederick W. Vaughan, Deputy Assistant Secretary, Office of Legislative Affairs, Department of the Treasury, Nov. 20, 2019.

⁸ *Id.*

⁹ Federal prosecutors alleged the following in their indictment, "Though some at HALKBANK, the defendant, supported continuing the scheme, Halkbank General Manager-1 initially was reluctant to do so because of concern that Zarrab's arrest and notoriety would draw unnecessary attention to the scheme. At Zarrab's request, however, the then-Prime Minister of Turkey and his associates, including a relative of the then-Prime Minister who later held multiple Turkish cabinet positions, instructed HALKBANK to resume the scheme, and HALKBANK agreed." Erdogan was prime minister during the Halkbank scheme, and Albayrak then had been the Turkish Minister of Energy. *Turkish Bank Charged in Manhattan Federal Court for Its Participation in a Multibillion-dollar Iranian Sanctions Evasion Scheme*, Department of Justice Press Release, Oct. 15, 2019; <https://www.justice.gov/opa/pr/turkish-bank-charged-manhattan-federal-court-its-participation-multibillion-dollar-iranian>.

These reports are part of a larger story highlighting former President Trump's efforts to accommodate the intense pressure campaign by the Turkish government to get investigations into Halkbank dropped, including a high-priced lobbying effort by Ballard Partners on Turkey's behalf.¹⁰ In 2017, President Trump reportedly asked Secretary of State Tillerson to pressure the Justice Department to drop the case against a co-conspirator in the Halkbank-assisted sanctions evasion schemes, Reza Zarrab, who was reported to have an office in Trump Tower Istanbul and was a client at the time of the President's attorney, Rudy Giuliani.¹¹ In a 2015 interview, then-candidate Trump stated about Turkey, "I have a little conflict of interest because I have a major, major building in Istanbul."¹² According to public financial disclosure forms, Trump personally earned between \$1.2 million and \$7 million in royalties from entities affiliated with Trump Towers Istanbul-Sisli during his Presidency.¹³

Additionally, former National Security Advisor John Bolton claimed that President Trump granted personal favors to President Erdogan during Trump's first term.¹⁴ In particular, Bolton alleged that Trump promised Erdogan he would use his authority to halt any further enforcement against Halkbank, and that he then instructed Mnuchin to interfere in the matter.¹⁵ Bolton also stated that on more than one occasion, the Department of Justice was aware of Secretary Mnuchin's efforts to intervene in the investigation and prosecution of Halkbank.¹⁶

Although Halkbank was eventually charged in the Southern District of New York in a six-count indictment related to the bank's participation in a multibillion-dollar scheme to evade U.S. sanction on Iran on October 15, 2019,¹⁷ these charges came just days after the Turkish invasion of northern Syria and the resulting political backlash.¹⁸ I am concerned that absent these

¹⁰ *Trump-Erdogan Call Led to Lengthy Quest to Avoid Halkbank Trial*, Bloomberg, Oct. 16, 2019; <https://www.bloomberg.com/news/articles/2019-10-16/trump-erdogan-call-led-to-lengthy-push-to-avoid-halkbank-trial>.

¹¹ *Trump Urged Top Aide to Help Giuliani Client Facing DOJ Charges*, Bloomberg, Oct. 9, 2019; <https://www.bloomberg.com/amp/news/articles/2019-10-09/trump-urged-top-aide-to-help-giuliani-client-facing-doj-charges>; *Trump Tower: Dictators' Home Away From Home*, Daily Beast, Sep. 30, 2015 Updated April, 14, 2017; <https://www.thedailybeast.com/trump-tower-dictators-home-away-from-home>.

¹² *President Trump Said in 2015 That He Has a 'Little Conflict of Interest' in Turkey*, Time, Apr. 19, 2017; <https://time.com/4746348/donald-trump-turkey-conflict-interest/>.

¹³ *Donald Trump's Longtime Business Connections in Turkey Back in the Spotlight*; NBC News, Oct. 9, 2019; <https://www.nbcnews.com/politics/trump-impeachment-inquiry/donald-trump-s-longtime-business-connections-turkey-back-spotlight-n1064011>.

¹⁴ JOHN BOLTON, *THE ROOM WHERE IT HAPPENED* 412 (2020) ("Barr said he was very worried about the appearances Trump was creating, especially his remarks on Halkbank to Erdogan in Buenos Aires at the G20 meeting, what he said to Xi Jinping on ZTE, and other exchanges").

¹⁵ *Id.* at 177 ("Trump started by saying we were getting very close to a resolution on Halkbank. He had just spoken to Mnuchin and Pompeo, and said we would be dealing with Erdogan's great son-in-law (Turkey's Finance Minister) to get it off his shoulders. Erdogan was very grateful, speaking in English no less.").

¹⁶ *Id.* at 170 ("Several times, Mnuchin was exuberant he had reached a deal with Turkey's Finance Minister. [. . .] In each case, the deal fell apart when Justice tanked it, which was why trying this route to get Brunson's release was never going to work.").

¹⁷ *Turkish Bank Charged in Manhattan Federal Court for Its Participation in a Multibillion-dollar Iranian Sanctions Evasion Scheme*, Department of Justice Press Release, Oct. 15, 2019; <https://www.justice.gov/opa/pr/turkish-bank-charged-manhattan-federal-court-its-participation-multibillion-dollar-iranian>.

¹⁸ *Trump Defends Syria Decision Amid Republican Backlash*, CNN, Oct. 8, 2019; <https://www.cnn.com/2019/10/07/politics/mitch-mcconnell-republican-response-syria-kurds/index.html>.

unrelated actions by the Turkish government, the Administration's interference in favor of Turkey's Halkbank requests could have undermined years of effort by U.S. law enforcement.

The DOJ spent years pursuing the criminal case against Halkbank, including an appeal that reached the Supreme Court, which affirmed in October 2025 a court decision that had allowed the prosecution to proceed.¹⁹ This deferred prosecution to which DOJ and Halkbank agreed last month does not require the bank to admit to any criminal wrongdoing or pay any fines.²⁰ In addition, Halkbank will be allowed to select the monitor that will review Halkbank's sanctions and anti-money laundering compliance.²¹ In court, DOJ told the judge hearing the case against Halkbank that U.S. judges generally lack the discretion to evaluate the substance of deferred prosecution agreements.²²

To better understand Treasury's role in the enforcement of U.S. sanctions and related trade and banking laws, I ask that you respond to the questions below as soon as possible, but no later than April 15, 2026.

- 1) Did the Treasury Department make any recommendation to the DOJ that Halkbank should or should not pay a fine as part of the disposition of the criminal case against Halkbank?
- 2) Did the Treasury Department formally initiate an investigation or commence work towards determining a fine for Halkbank? If so, when did the Department begin this process?
- 3) Did the Treasury Department's Office of Foreign Assets Control (OFAC) come to any conclusions of fact or make recommendations to the Department's leadership regarding the figure for a potential regulatory fine for Halkbank?
- 4) Did you or any other Treasury officials have any meetings or other communications with Turkish officials since January 20, 2025? If so, please describe the number and substance of these communications.
- 5) Did you or any other Treasury officials have any meetings or other communications with Halkbank representatives since January 20, 2025? If so, please describe the number and substance of these communications.
- 6) Did you or any other Treasury officials have any meetings or other communications with the President or White House officials regarding Halkbank? If so, please describe the number and substance of these communications.

¹⁹ Judge has limited role in resolving US Halkbank criminal case, prosecutor says, Reuters, Mar. 11, 2026; <https://www.reuters.com/world/middle-east/judge-weigh-halkbank-us-prosecutors-resolution-criminal-case-2026-03-11/>.

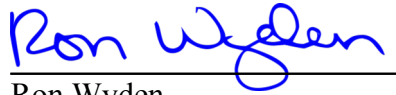
²⁰ Judge has limited role in resolving US Halkbank criminal case, prosecutor says, Reuters, Mar. 11, 2026; <https://www.reuters.com/world/middle-east/judge-weigh-halkbank-us-prosecutors-resolution-criminal-case-2026-03-11/>.

²¹ *Id.*

²² *Id.*

If you have any questions, you may contact my Senate Finance Committee oversight staff at 202-224-4515. Thank you for your prompt attention to this important matter.

Sincerely,

A handwritten signature in blue ink that reads "Ron Wyden". The signature is fluid and cursive, with the first name "Ron" and last name "Wyden" clearly distinguishable. It is positioned above a horizontal line.

Ron Wyden
United States Senator
Ranking Member, Committee
on Finance