



August 12, 2025

Paul Abbott  
Chief Executive Officer  
American Express Global Business Travel Inc.  
666 3<sup>rd</sup> Avenue  
4<sup>th</sup> Floor  
New York NY 10172

Patrick Anderson  
Chief Executive Officer  
CWT Holdings  
701 Carlson Parkway  
Suite 900  
Minneapolis, MN 55305

Dear Mr. Abbot and Mr. Anderson,

We write to request information regarding American Express Global Business Travel's (Amex GBT) and CWT Holdings' (CWT) hiring of lobbyists and political consultants in connection with efforts to resolve antitrust litigation brought by the Department of Justice (DOJ) over the planned merger of your companies. The sudden dismissal of the Department's complaint, a resolution that avoids statutorily required lobbying disclosures that would have accompanied a settlement, raises significant concerns about the role of outside consultants, including Ballard Partners,<sup>1</sup> in influencing DOJ enforcement actions and follows on serious allegations of political interference and retaliation against the Antitrust Division in connection with another recent resolution.<sup>2</sup> Additional reporting indicates these events may be part of a wider pattern of lobbyists and consultants with close ties to the White House and the Trump family having outsized and undue influence on antitrust investigations and enforcement actions.<sup>3</sup>

On January 10, 2025, the Antitrust Division filed a lawsuit challenging the proposed \$570 million merger of your companies. The acquisition would have seen Amex GBT, the global-market leader in travel management services, purchase CWT, its second-largest competitor and

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<sup>1</sup> The American Prospect, "DOJ Does MAGA Lobbyist Bidding Again, Shuttters Another Antitrust Case," July 29, 2025, <https://prospect.org/justice/2025-07-29-doj-maga-lobbyist-bidding-shuttters-another-antitrust-case-bondi-ballard/>.

<sup>2</sup> CBS News, "Top DOJ antitrust officials fired as tension grows in a Trump administration monopoly-fighting office," July 28, 2025, <https://www.cbsnews.com/news/top-doj-antitrust-officials-fired-as-tension-grows-in-a-trump-administration-monopoly-fighting-office/>.

<sup>3</sup> The Wall Street Journal, "MAGA Antitrust Agenda Under Siege by Lobbyists Close to Trump," Aug. 6, 2025, [https://www.wsj.com/us-news/law/maga-antitrust-agenda-under-siege-by-lobbyists-close-to-trump-18558898?gaa\\_at=eafs&gaa\\_n=ASWzDAhRuCosFZNjDoeUAyaW\\_wkay--eXW7nXVYLP9I8H5yosqKkMxI7z5IZu1zfSzo%3D&gaa\\_ts=6894ae40&gaa\\_sig=xm2EqSCJ7h2EpvIn-be8rUAW7PgufNk9slqfFm135u3-2viA4cLEbpxw26wNbY2PAS\\_J-oibfmJFjJM2mHhlyQ%3D%3D](https://www.wsj.com/us-news/law/maga-antitrust-agenda-under-siege-by-lobbyists-close-to-trump-18558898?gaa_at=eafs&gaa_n=ASWzDAhRuCosFZNjDoeUAyaW_wkay--eXW7nXVYLP9I8H5yosqKkMxI7z5IZu1zfSzo%3D&gaa_ts=6894ae40&gaa_sig=xm2EqSCJ7h2EpvIn-be8rUAW7PgufNk9slqfFm135u3-2viA4cLEbpxw26wNbY2PAS_J-oibfmJFjJM2mHhlyQ%3D%3D).

the nation's third largest travel management company.<sup>4</sup> DOJ identified several areas of anti-competitive concerns, specifically, that the post-merger Amex GBT would control an even larger portion of the market, and "risk higher prices, fewer choices, and less innovation," in an industry one CWT shareholder has already described as "oligopolistic."<sup>5</sup> However, though a trial date was set for September of this year, on July 29, 2025 the DOJ abruptly dropped the case, without notifying the public via a press release on its website, citing only "prosecutorial discretion" in its court filing.<sup>6</sup>

The decision to dismiss the case, as well as the timing of that decision raise several questions about whether undue influence contributed to the DOJ's decision to drop the case, and whether the dismissal was part of a larger coordinated effort to avoid scrutiny of the influence and power that consultants and lobbyists are exercising in the Department's decision-making surrounding antitrust cases.

*First*, Congressional lobbying disclosures reveal that Amex GBT hired Ballard Partners, a firm closely connected to President Trump, that previously employed both White House Chief of Staff Susie Wiles as well as Attorney General Pam Bondi, to advocate on its behalf in antitrust matters.<sup>7</sup> Under the *Tunney Act*, the hiring of such outside lobbyists and any other consultants would also have to be disclosed as part of any settlement process with DOJ. However, by voluntarily dismissing the case rather than settling, DOJ allowed Amex GBT and CWT to avoid disclosing any other lobbyists and consultants, other than Ballard Partners, retained in connection with the merger challenge.<sup>8</sup> Recent reporting indicates that, rather than seeking a settlement, DOJ may have dismissed the case deliberately to avoid *Tunney Act* disclosures by Amex GBT and CWT.<sup>9</sup> That reporting raises serious questions about what is being hidden by DOJ's strategic dismissal of its lawsuit.

*Second*, the dismissal of the case comes amid allegations that top Antitrust Division officials have been sidelined and pressured by authorities both inside and outside the DOJ to end antitrust lawsuits against companies that employ well connected lobbyists and consultants, such as yours.<sup>10</sup> The dismissal here came just one day after two of the Antitrust Division's most senior

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<sup>4</sup> U.S. v. Global Business Travel Group, Inc. and CWT Holdings, LLC, (N.D. Cal., 2025), Complaint, p. 2, <https://www.justice.gov/archives/opa/media/1383711/dl>.

<sup>5</sup> *Id.*

<sup>6</sup> Law360, "DOJ Drops Challenge Of Amex GBT's \$570M Deal For CWT Sale," July 29, 2025, [https://www.law360.com/publicpolicy/articles/2370848?nl\\_pk=870412f1-daf4-460f-b5f1-9cf9b88968c7&ab\\_exp\\_id=nl\\_subject&ab\\_exp\\_var=b&utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=publicpolicy&utm\\_content=2025-07-30&read\\_main=1&nlsidx=0&nlaidx=31](https://www.law360.com/publicpolicy/articles/2370848?nl_pk=870412f1-daf4-460f-b5f1-9cf9b88968c7&ab_exp_id=nl_subject&ab_exp_var=b&utm_source=newsletter&utm_medium=email&utm_campaign=publicpolicy&utm_content=2025-07-30&read_main=1&nlsidx=0&nlaidx=31).

<sup>7</sup> The American Prospect, "DOJ Does MAGA Lobbyist Bidding Again, Shuttters Another Antitrust Case," July 29, 2025, <https://prospect.org/justice/2025-07-29-doj-maga-lobbyist-bidding-shuttters-another-antitrust-case-bondi-ballard/>.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> The Capitol Forum, "HPE/Juniper: As Fight Between DOJ Leadership and Antitrust Division Broils, Tunney Act Proceeding Looms," July 24, 2025, <https://thecapitolforum.com/hpe-juniper-as-fight-between-doj-leadership-and-antitrust-division-broils/>.

officials, Roger P. Alford, the Deputy Assistant Attorney General for Antitrust, and William Rinner, head of merger enforcement, were placed on administrative leave, before being terminated, nominally for insubordination, shortly after opposing a similar antitrust settlement involving two companies that had also hired well-connected consultants.<sup>11</sup>

The similarities between the DOJ's handling of the Amex GBT / CWT merger and its action with Hewlett Packard Enterprises and Juniper<sup>12</sup> illustrate a potentially alarming pattern of behavior: Trump-aligned political operators reportedly interfering with the Antitrust Division's enforcement of our antitrust laws.

Given the concerning nature of these reports, we request your responses to the following questions by no later than August 26, 2025:

- 1.) Please provide a list of all consultants, advisors, and outside lawyers that were hired, directly or indirectly, by Amex GBT and/or CWT in connection with their attempt to merge (including subcontractors or payments through consultants to other individuals or firms), and the purposes and contracts under which Amex GBT and CWT hired those individuals.
- 2.) Please provide a list of individuals and firms that were hired, directly or indirectly, by Amex GBT and/or CWT in order to influence public opinion regarding the proposed merger.
- 3.) Please describe the scope and nature of consulting and other services provided by Ballard Partners and any other outside lobbyist or consultants which you would have had to disclose under Section 16(g) of the *Tunney Act*.
- 4.) Please describe any discussions that Amex GBT and CWT or their consultants had with non-Antitrust Division Administration personnel regarding the DOJ's lawsuit against their proposed merger.
- 5.) Please describe any discussions that Amex GBT and CWT or their consultants had with any members of the Trump family regarding the DOJ's lawsuit against their proposed merger.
- 6.) Please describe any discussions or negotiations you undertook with DOJ concerning a possible settlement of the matter.

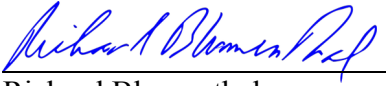
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<sup>11</sup> CBS News, "Top DOJ antitrust officials fired as tension grows in a Trump administration monopoly-fighting office," July 28, 2025, <https://www.cbsnews.com/news/top-doj-antitrust-officials-fired-as-tension-grows-in-a-trump-administration-monopoly-fighting-office/>.

<sup>12</sup> Which may have included an incomplete Tunney Act disclosure by the parties. The Capitol Forum, "HPE/Juniper: As Fight Between DOJ Leadership and Antitrust Division Broils, Tunney Act Proceeding Looms," July 24, 2025, <https://thecapitolforum.com/hpe-juniper-as-fight-between-doj-leadership-and-antitrust-division-broils/>.

Thank you for your attention to this important matter.

Sincerely,



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Richard Blumenthal  
United States Senator



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Elizabeth Warren  
United States Senator

CC: Department of Justice, Office of the Inspector General