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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS

WASHINGTON, DC 20510–6250

November 5, 2026

VIA EMAIL

Paolo Ardoino
Chief Executive Officer
Tether
Final Av. La Revolucion, Edif, Centro
Corporativo Presidente Plaza, Nivel 12
San Salvador, H3 00000, El Salvador

Bo Hines
Chief Executive Officer
Tether US
c/o Corporation Service Company
251 Little Falls Dr.
Wilmington, DE 19808

Dear Mr. Ardoino, Mr. Hines:

For 18 months, the Permanent Subcommittee on Investigations ("the Subcommittee") minority has been conducting an inquiry into the illicit use of cryptocurrencies including cryptocurrency firms' campaign to influence cryptocurrency policy and their anti-money laundering policies and practices. Throughout this period, Tether has failed to adequately respond to the Subcommittee's requests and has not produced any responsive records. Given your company's failure to adequately respond, I am writing to renew my June 6, 2026 and October 22, 2026 requests for records and information. For your reference, my previous letters and records requests are enclosed as an attachment to this letter.

The Subcommittee expects you to carefully review and follow the enclosed production instructions to ensure that all records produced can be accessed and reviewed in a timely manner. Please begin producing responsive records by no later than November 30, 2026, with additional records to follow on a schedule agreed upon in advance by Subcommittee staff. Any questions about the scope of the enclosed requests should be relayed to Subcommittee staff well in advance of the deadline. Please also note that failure to voluntarily produce the requested records and information by January 4, 2027, will leave the Subcommittee with no choice but to consider alternative measures to obtain compliance.

Please contact Subcommittee staff by November 9, 2026, to confirm receipt of this letter.

Sincerely,

Richard Blumenthal
Ranking Member
Permanent Subcommittee on Investigations

cc: The Honorable Ron Johnson
Chairman
Permanent Subcommittee on Investigations

RAND PAUL, KENTUCKY, CHAIRMAN

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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS

WASHINGTON, DC 20510–6250

October 22, 2026

VIA EMAIL

Paolo Ardoino
Chief Executive Officer
Tether
Final Av. La Revolucion, Edif, Centro
Corporativo Presidente Plaza, Nivel 12
San Salvador, H3 00000, El Salvador

Dear Mr. Ardoino:

The Senate Permanent Subcommittee on Investigations ("PSI" or the "Subcommittee") minority is conducting an ongoing inquiry into the illicit use of cryptocurrencies and the Trump Administration's self-enrichment and self-dealings with cryptocurrency firms. Recent reporting has revealed that Tether paid millions of dollars to a business partially controlled by the White House official responsible for cryptocurrency policy, while that same official lobbied for loopholes in legislation on its behalf. I therefore write to demand that you provide the Subcommittee with all records and information related to contracts, payments, communications, and lobbying with the firm, Nxum, its cofounder Bo Hines, and all associated parties.

According to the Wall Street Journal, in May 2025, Tether entered into a deal with the small consulting and investment firm Nxum to develop a "strategic brand and public affairs plan" for the stablecoin issuer.[1] Nxum had little history providing consulting services for successful cryptocurrency firms, previously having attempted to market a marijuana-themed digital asset and a Trump-themed meme coin, both of which failed. However, Nxum did have one particular advantage: its cofounder, Bo Hines, had been appointed "Executive Director of the Presidential Council of Advisers for Digital Assets" for the Trump Administration the prior December and had recently begun working on stablecoin legislation for the White House.[2]

[1] Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions from a Crypto Giant*, WALL ST. J. (Oct. 14, 2026) https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.

[2] Gerhard Peters & John T. Woolley, *Statement by President-elect Donald J. Trump Announcing Science and Technology Team Online*, THE AM. PRESIDENCY PROJECT (Dec. 22, 2024) https://www.presidency.ucsb.edu/node/375595.

According to the Wall Street Journal, as the White House dropped enforcement actions against cryptocurrency firms and lobbied Congress for legislation favorable to the industry, over $6 million flowed into Nxum from Tether—all while Bo Hines sought special exemptions and dispensation on behalf of the firm. In May 2025, Tether agreed to pay Nxum $415,000 a month after the consulting firm had pitched it a "strategic lobbying and a full scale public relations and media awareness campaign."[3] While Hines failed to divest his one-third stake in Nxum, according to messages seen by the Wall Street Journal, he worked closely over encrypted messaging applications with Nxum to coordinate lobbying, advocacy, and browbeating of members of Congress that were opposed to, or had sought changes to, pending stablecoin legislation. Those messages also reportedly demonstrate that Tether was directly coordinating Nxum's lobbying efforts on the GENIUS Act which would regulate stablecoins, with CEO Paolo Ardoino demanding that Nxum "obliterate" the legislation's opponents. Mr. Hines personally lobbied for changes to the GENIUS Act that would predominantly benefit Tether by allowing it to continue operating outside of the United States and providing it more time to come into compliance with regulations—provisions that have become known as the "Tether loophole."[4]

The highly unusual terms and nature of Tether's business relationship with both Nxum and Bo Hines raise alarming ethical and legal concerns, indicating that Tether was likely well aware of the illegality and impropriety of issuing payments to a current White House official with such a direct role in shaping cryptocurrency legislation that was instrumental to its business. Rather than directly contracting with Mr. Hines's firm, Tether assigned its contract and sent its payments in cryptocurrency through a marketing firm, Notorious, that then passed to Nxum, after which it was split three ways and transferred again.[5] As soon as Hines left the White House, Tether began to directly contract with and send payments to Nxum. Nxum later allegedly offered the director of Notorious over $300,000 and a stake in future Tether payments in return for a nondisclosure agreement. Within days of leaving the White House, Tether announced that it had hired Mr. Hines, ultimately naming him the CEO of its new Tether U.S. operations.[6] These lucrative arrangements allowed Mr. Hines a new lifestyle that includes traveling by private jet.[7]

Tether's alleged multimillion dollar payment to a firm controlled by the White House official primarily responsible for cryptocurrency policy implicates federal ethics, anticorruption,

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[3] Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions from a Crypto Giant*, WALL ST. J. (Oct. 14, 2026) https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.

[4] *Id.*; *Congress Must Close Money Laundering and Sanctions Evasion Loopholes in Final Cryptocurrency Legislation*, TRANSPARENCY INT'L U.S. (June 17, 2025) https://us.transparency.org/news/congress-must-close-money-laundering-and-sanctions-evasion-loopholes-in-final-cryptocurrency-legislation/.

[5] Nxum is controlled by three parties: Bo Hines, his father Todd Hines, and marketing executive Gary Dennis. Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions from a Crypto Giant*, WALL ST. J. (Oct. 14, 2026) https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.

[6] *Tether Appoints Former White House Crypto Council Executive Director Bo Hines as Strategic Advisor for Digital Assets and U.S. Strategy*, TETHER (Aug. 19, 2025), https://tether.io/news/tether-appoints-former-white-house-crypto-council-executive-director-bo-hines-as-strategic-advisor-for-digital-assets-and-u-s-strategy/.

[7] Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions from a Crypto Giant*, WALL ST. J. (Oct. 14, 2026,) https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.

and lobbying laws. To assist the Subcommittee in its inquiry, please provide responses to the following requests for records and information by November 3, 2026.[8]

1. When did Tether first consider a potential business partnership with Nxum, and what were the circumstances under which Nxum began to do business with Tether?

    a. Please provide a breakdown of all payments provided by Tether to Nxum, Notorious, or any individuals affiliated with either entity, including the date of payment, payment method, and any wallet addresses associated with cryptocurrency transactions.

    b. Please describe all consulting and lobbying services that Nxum has provided to Tether, regardless of whether those activities were specified under the written terms of any contract between the firms.

2. Why did Tether use Notorious and its CEO Peter Vincer as an intermediary for its business partnership with Nxum? Why did Tether and Nxum begin to directly contract after Mr. Hines left the White House, and why did the firms later seek a nondisclosure agreement from Mr. Vincer?

3. According to The Wall Street Journal, Mr. Hines coordinated with Mr. Vincer on the change of contract from Notorious to directly contracting to Nxum, even writing him "everyone has agreed that you are never to be f—ed."[9] What awareness or involvement did Mr. Hines have regarding Tether's business relationship between Nxum, Mr. Vincer, and Notorious prior, during, and after any agreement?

4. According to the Wall Street Journal, Nxum has recently sought further investment with the claim that Tether plans to purchase 25% stake in Nxum for $56 million. What is the current relationship between Nxum and Tether, and have the two firms discussed Tether potentially taking a stake in Nxum?

5. Please provide all records, including communications and contracts, relating to any business dealings with Nxum. This includes, but is not limited to, any negotiations, draft

[8] Unless otherwise specified, the time period for each request is from January 1, 2024, to present. For the purposes of this request, the term. "Tether" includes iFenix Inc., Tether Holdings El Salvador S.A. de C.V., Tether U.S., and any other subsidiaries, divisions, partnerships, properties, affiliates, branches, groups, special purpose entities, joint ventures, predecessors, successors, or any other related entity. "Records" include any written, recorded, or graphic material of any kind, including letters, memoranda, reports, notes, electronic data (emails, email attachments, and any other electronically-created or stored information), direct messages, chats, calendar entries, inter-office communications, meeting minutes, phone/voice mail or recordings/records of verbal communications, and drafts (whether or not they resulted in final documents).

[9] Sam Kessler, *He Crafted a Crypto Law for Trump—as His Company Got Millions from a Crypto Giant*, WALL ST. J. (Oct. 14, 2026) https://www.wsj.com/politics/policy/crypto-law-trump-tether-bo-hines-45bcd95d.

contracts, or agreements between the firms, records involving or relating to Bo Hines, discussion of White House or state and federal regulators, lobbying on Tether's behalf, or compliance with any laws and regulations applicable to Tether.

6. Please provide all records, including communications[10] and contracts, between Tether and Mr. Vincer and his firm Notorious. This includes, but is not limited to, any negotiations, draft contracts, or agreements related to Tether's partnership with Nxum, coordination of payments, discussions of Mr. Vincer's role in the firms' partnership, the terminations of that role, and any request or negotiation over a nondisclosure agreement.

7. Please provide all records relating to communications and contracts with Bo Hines between January 20, 2025, and August 9, 2025. This includes, but is not limited to, any discussion of White House or state and federal regulators or regulations, lobbying on Tether's behalf or regarding cryptocurrencies, or Mr. Hines' employment after leaving the White House.

Please contact the Subcommittee if you have any questions about responding to these requests.

Sincerely,



Richard Blumenthal
Ranking Member
Permanent Subcommittee on Investigations

cc: The Honorable Ron Johnson
Chair
Permanent Subcommittee on Investigations

[10] For purposes of this request, "communications" include any records, as defined above, transmitted in any way between two or more individuals or entities.

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United States Senate

COMMITTEE ON
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS

WASHINGTON, DC 20510–6250

June 4, 2026

VIA EMAIL

Paolo Ardoino
Chief Executive Officer
Tether
Final Av. La Revolucion, Edif, Centro
Corporativo Presidente Plaza, Nivel 12
San Salvador, H3 00000, El Salvador

Dear Mr. Ardoino:

The Permanent Subcommittee on Investigations ("PSI" or "the Subcommittee") is conducting an ongoing inquiry into cryptocurrency's role in the Iranian shadow banking network and other illicit financial operations. Through this inquiry, I have become deeply concerned about the recurring role of Tether's stablecoin in Iranian and Russian money laundering schemes, including recently sanctioned Iranian cryptocurrency exchanges. I therefore demand that you provide the Subcommittee with all records and information related to Tether's apparent failure to prevent illicit use by sanctioned entities, terrorist organizations, and other money laundering schemes associated with Iran and Russia.

On June 2, 2026, the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC") sanctioned the Iranian cryptocurrency exchanges Nobitex, Wallex, Bitpin, and Ramzinex based on their role in financially supporting the regime, sanctions evasion, and money laundering by the Islamic Revolutionary Guard Corps ("IRGC"). These designations follow a recent warning from the Department of Treasury that cryptocurrencies have become "one leg of Iran's shadow banking network," naming stablecoins and "large volume stablecoin issuers," of which Tether is the largest, as being of particular concern.[1] Additionally, on May 26, 2026 the United Kingdom sanctioned Huobi Global—listed as a partner on Tether's website—for its ties to the Russian government during the country's war on Ukraine, including supporting the Russian cryptocurrency services A7 and Garantex (both also sanctioned by OFAC for cybercrime and sanctions evasion).

[1] Financial Crimes Enforcement Network, *Financial Crimes Enforcement Network Alert FIN-2026-Alert002* (May 11, 2026), https://www.fincen.gov/system/files/2026-05/FinCEN-Alert-IRGC.pdf.

Through its U.S. dollar-pegged stablecoin, USDT, Tether has provided unparalleled access to a high-liquidity and widely accepted international payment system that is otherwise denied to Iran due to international sanctions and counterterrorism financing measures. For example, according to *The Wall Street Journal* and *Fortune,* hundreds of millions of dollars of USDT were used in two Chinese money laundering schemes that enabled illicit oil sales and financed terrorist organizations such as the Yemeni Houthis. This USDT was also then, in part, transferred to Nobitex, which OFAC alleges "facilitated a significant number of digital asset transactions linked to the IRGC, including transactions for wallets associated with IRGC-affiliated ransomware actors."[2]

The Subcommittee's review of blockchain records, sanctions designations, asset seizure notices, and industry reporting raises significant concerns about USDT's repeated use by the Islamic Republic and its proxies, such as Hizballah, Hamas, and the Houthis (Ansarallah). Over the course of six years, OFAC and Israel's National Bureau for Counter Terror Financing ("NBCTF") have designated hundreds of cryptocurrency wallets for financing and facilitating transfer of funds to Iran, the IRGC, and its proxies. A review by the Subcommittee of these sanctions and seizures has found the wallets designated are predominantly Tron and Ethereum blockchain addresses that have transacted in USDT. Furthermore, according to their websites, Nobitex, Wallex, Bitpin, and Ramzinex still deal substantially in Tether's stablecoin, including exchanging USDT for Iranian Rial, even in the middle of the ongoing war and after OFAC designations. Further, Nobitex advises their customers how to evade sanctions with USDT.

The Subcommittee's review raises questions about whether and how Tether complies with American sanctions law and other counterterrorism finance measures, as well as the steps it takes when its customers and wallets transacting Tether cryptocurrencies can be credibly linked with illicit finance. Tether was originally founded in the United States and maintains a deep reliance on American financial infrastructure, including its operational and business relationship to Cantor Fitzgerald and the family of the Secretary of Commerce, Howard Lutnick. However, despite these ties, Tether has stated its compliance with OFAC sanctions is "voluntary" and that it follows "OFAC *guidelines*" (emphasis added).[3] The use of Tether's stablecoin in Iranian shadow banking, and uncertain compliance with American sanctions and banking law, has a significant impact on the United States' ability to apply economic pressure on the Islamic Republic to negotiate an end to the current war and resolve matters such as its nuclear program and regional destabilization.

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[2] U.S. Department of the Treasury, *Economic Fury Targets Iran's Largest Digital Asset Exchange for Terror Finance and Sanctions Evasion* (June 2, 2026) https://home.treasury.gov/news/press-releases/sb0519.

[3] Tether, *Tether Supports Freeze of More Than $344 Million in USD₮ in Coordination with OFAC and U.S. Law Enforcement* (Apr. 23, 2026) https://tether.io/news/tether-supports-freeze-of-more-than-344-million-in-usdt-in-coordination-with-ofac-and-u-s-law-enforcement/; Tether, *Tether Facts* (last acc. June 4, 2026) https://tetherfacts.com/.

Accordingly, and pursuant to Rule XXV of the Standing Rules of the Senate, Senate Resolution 94 (119th Cong.), Section 12, and PSI Rule 1, please provide information and records responsive to the following requests by June 12, 2026.

1. What legal jurisdictions does Tether believe it is subject to for USDT, in particular for anti-money laundering rules, reporting obligations, asset seizures, and sanctions compliance? Does Tether believe it is legally required to comply with Department of Treasury sanctions for USDT and issue suspicious activity reports (SARs) to the U.S. government for suspected illicit finance?

2. As the issuer of USDT, Tether has the technical means to freeze and block wallets from withdrawing funds through a 'blacklist' function built into the stablecoin. Has Tether frozen all USDT or other assets held in wallets associated with, or custodied by, the sanctioned entities Nobitex, Wallex, Bitpin, and Ramzinex in compliance with OFAC designations? If not, why not?

3. Will Tether terminate its partnership with Huobi Global and freeze any USDT or other assets associated with Huobi Global? What steps will Tether take with respect to Huobi's cryptocurrency exchange HTX?

4. Has Tether ever failed or declined to blacklist a wallet address or terminate a client where it had reason to believe that the wallet or client was engaged in illicit finance?

5. What operational presence does Tether have in the Middle East (including the U.A.E. and Turkey) and Russia, including but not limited to bank accounts, client support services, sales representatives, or other mechanisms to convert between issued USDT and fiat currencies?

In addition, please provide the following records:

1. All records related to any investigation, requests for information for clients, SARs, reports provided to Tether, or information related to Nobitex, Wallex, Bitpin, Ramzinex, or any other Iranian cryptocurrency exchange.

2. All records related to any investigation, requests for information for clients, SARs, reports provided to Tether, or information related to A7, Garantex, and Huobi Global's involvement with Russian entities.

3. All records related to any investigation, requests for information for clients, SARs, reports provided to Tether, or information related to the use of USDT by the Central Bank of Iran,

and any steps that Tether has taken to further prevent the Central Bank of Iran's use of USDT for money laundering.

4. All records related to any investigation, requests for information, SARs, or provision of information where Tether subsequently declined to blacklist wallets, request information from any partner (such as exchanges), or terminate a client involved in Iranian shadow banking system.

Please contact the Subcommittee if you have any questions about responding to these requests.

Sincerely,

Richard Blumenthal
Ranking Member
Permanent Subcommittee on Investigations

cc: The Honorable Ron Johnson
Chairman
Permanent Subcommittee on Investigations