

United States Senate  
WASHINGTON, DC 20510

May 23, 2022

**VIA ELECTRONIC TRANSMISSION**

The Honorable Merrick Garland  
Attorney General  
Department of Justice

Dear Attorney General Garland:

In 2020, we examined the extent to which Blue Star Strategies, a Democratic lobbying firm, met with Obama administration officials on behalf of its foreign client, Burisma Holdings (“Burisma”), and the company’s corrupt Russia-aligned owner, Mykola Zlochevsky.<sup>1</sup> Based on our investigative records and recently published Foreign Agents Registration Act (“FARA”) forms, it appears that Blue Star Strategies’ top executives, Karen Tramontano and Sally Painter, filed incomplete and misleading information with the Department of Justice (“DOJ”).

According to FARA filings dated May 12, 2022, Ms. Tramontano and Ms. Painter disclosed under penalty of perjury their meetings with government officials on behalf of Burisma and Mr. Zlochevsky.<sup>2</sup> The form noted that in February 2016, Blue Star Strategies emailed and met with then-State Department official Amos Hochstein to “introduce Mr. Zlochevsky’s attorney so he could present an explanation of the adverse proceedings in the U.K. and Ukraine involving Mr. Zlochevsky.”<sup>3</sup> The form also indicated that in March 2016, Blue Star Strategies

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<sup>1</sup> See e.g. S. Comm. on Homeland Security & Governmental Affairs, Subpoena to Blue Star Strategies, May 22, 2020; Letter from Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin., to Blue Star Strategies (Dec. 3, 2019), <https://www.hsgac.senate.gov/imo/media/doc/2019-12-3%20RHJ,%20CEG%20to%20Blue%20Star%20Strategies%20re%20Burisma.pdf>; Transcript of Interview, S. Comm. on Fin. and S. Comm. on Homeland Sec. and Governmental Aff. Interview of Karen Tramontano (Aug. 28, 2020), <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>. [Hereinafter Karen Tramontano Testimony]; See also Karen Tramontano Interview Errata, <https://www.hsgac.senate.gov/imo/media/doc/Unified%20Tramontano%20Transcript%20Errata.pdf>; Transcript of Interview, S. Comm. on Fin. and S. Comm. on Homeland Sec. and Governmental Aff. Interview of Sally Painter (Aug. 31, 2020), <https://www.hsgac.senate.gov/imo/media/doc/2020-08-31-Painter%20Interview%20with%20Exhibits.pdf>. [Hereinafter Sally Painter Testimony]; See also Sally Painter Interview Errata <https://www.hsgac.senate.gov/imo/media/doc/Unified%20Painter%20Transcript%20Errata.pdf>; Ben Schrekinger, ‘Hiding the Ball’: Hunter Biden Complicates White House Anti-Corruption Push, Politico (Oct. 12, 2021) <https://www.politico.com/news/magazine/2021/10/12/hunter-biden-corruption-515583>; Miranda Devine, Hunter Biden pitched himself as expert in Russian oligarch targeted by FBI, N.Y. Post (Oct. 20, 2021) <https://nypost.com/2021/10/20/hunter-biden-pitched-himself-as-expert-in-russian-oligarch-targeted-by-fbi/>.

<sup>2</sup> Foreign Agents Registration Act filing for Blue Star Strategies (May 12, 2022) at 6, available at <https://efile.fara.gov/docs/6587-Exhibit-AB-20220512-3.pdf>.

<sup>3</sup> *Id.*

emailed and met with then-Under Secretary of State Catherine Novelli for the same purpose.<sup>4</sup> However, it appears the date of the meeting with Mr. Hochstein is inconsistent with our investigative records. Further, Blue Star Strategies' FARA filing states that its activity with respect to Mr. Zlochevsky and Burisma "began and ended in 2016"; however, our records indicate that the activity began in 2015 and extended several years after 2016.<sup>5</sup> Accordingly, it appears that Blue Star Strategies failed to disclose several other meetings it arranged with U.S. government officials on behalf of Burisma and Mr. Zlochevsky in its FARA filing.

Specifically, Ms. Tramontano wrote to our Committees in December 2019 that Blue Star Strategies had two meetings with Mr. Hochstein regarding Burisma—the first meeting was on December 10, 2015, and the second meeting on March 24, 2016.<sup>6</sup> Blue Star Strategies failed to disclose these meetings on its FARA form.

With respect to the December 2015 meeting, Ms. Tramontano noted that the "initial meeting with Mr. Hochstein was to understand his and the State Department's position regarding an independent energy company, Burisma."<sup>7</sup> In a transcribed interview with our Committees, Ms. Tramontano discussed the December 10, 2015, meeting and described Mr. Hochstein's view of Burisma as "negative."<sup>8</sup> It is unclear why Blue Star Strategies did not disclose this initial meeting with Mr. Hochstein in its FARA form.

With respect to the second meeting with Mr. Hochstein, according to our records, Ms. Painter and attorney John Buretta were in attendance.<sup>9</sup> While it appears that Blue Star Strategies provided an accurate description of the purpose of this meeting on its FARA form, the date of this meeting on the form is inconsistent with the information the firm provided our Committees. Whereas the FARA form indicates that the meeting between Blue Star Strategies, Mr. Buretta, and Mr. Hochstein occurred in February 2016, Ms. Tramontano and Ms. Painter confirmed to our Committees that this second meeting with Mr. Hochstein occurred on March 24, 2016.<sup>10</sup>

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at 5; Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18, 2019) at 188, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>.

<sup>6</sup> Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18, 2019) at 187, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>.

<sup>7</sup> *Id.*

<sup>8</sup> Karen Tramontano Testimony at 73-74; *See also* Karen Tramontano Interview Errata <https://www.hsgac.senate.gov/imo/media/doc/Unified%20Tramontano%20Transcript%20Errata.pdf>.

<sup>9</sup> In its Dec. 18, 2019 letter to our Committees, Ms. Tramontano described Mr. Buretta as "Burisma's U.S. counsel." In the FARA form, Mr. Buretta is not named, but instead described as "Mr. Zlochevsky's attorney." *See* Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18, 2019) at 188, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>; Foreign Agents Registration Act filing for Blue Star Strategies, May 12, 2022 at 6, available at <https://efile.fara.gov/docs/6587-Exhibit-AB-20220512-3.pdf>.

<sup>10</sup> Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18,

In addition, Ms. Tramontano told the Committees that Blue Star Strategies engaged in “government relations assistance” in the United States for Burisma and Mr. Zlochevsky.<sup>11</sup> However, Ms. Painter denied to the Committees that Blue Star Strategies’ activities were “government relations assistance.”<sup>12</sup> Both Ms. Tramontano and Ms. Painter denied to the Committees that they lobbied the U.S. Government on behalf of Burisma and Mr. Zlochevsky and denied that they intended to influence U.S. policy with respect to them.<sup>13</sup> However, Mr. Hochstein’s testimony before the Committees contradicted Ms. Tramontano’s and Ms. Painter’s claims. When the Committees asked Mr. Hochstein whether he believed Blue Star Strategies intended to “alter or influence U.S. policy with respect to Zlochevsky,” he told the Committees, “[t]hey did not like my answer [regarding Mr. Zlochevsky], and they tried to convince me otherwise.”<sup>14</sup> This example indicates that Blue Star Strategies did, in fact, engage in lobbying efforts on behalf of Burisma and its owner.

Based on the evidence in our possession, it appears Blue Star Strategies failed to disclose on the FARA form at least nine other meetings it had with U.S. government officials—including two meetings with sitting U.S. ambassadors to Ukraine—regarding Burisma and Mr. Zlochevsky including the following:<sup>15</sup>

1. December 14, 2015, meeting with State Department official William Laitinen;<sup>16</sup>
2. December 14, 2015, meeting with USAID official Steve Gonyea;
3. December 16, 2015, meeting with U.S. Ambassador Geoffrey Pyatt;

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2019) at 187, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>; Sally Painter at Testimony at 115-116.

<sup>11</sup> Karen Tramontano Testimony at 39.

<sup>12</sup> Sally Painter Testimony at 39; *See also* Sally Painter Interview Errata <https://www.hsgac.senate.gov/imo/media/doc/Unified%20Painter%20Transcript%20Errata.pdf>; Moreover, when questioned whether Blue Star Strategies engaged in “government relations assistance” *in Ukraine* on behalf of Burisma, Painter implied that it did: “I mean, we were engaging with the government, yes.” Sally Painter Testimony at 40.

<sup>13</sup> Karen Tramontano Testimony at 48 (“We didn’t lobby the U.S. government.”) and 49 (“In our representation of Burisma, we did not try to influence U.S. policy with respect to Ukraine.”) and Sally Painter Testimony at 43 (Question: “When meeting with U.S. government officials, did you intend to influence U.S. policy towards Burisma?” Answer: “No.”) and 167 (“I do not consider them to be lobbying. I consider that to be exploring to understand the position of the U.S. government.”).

<sup>14</sup> Transcript of Interview at 138, S. Comm. on Fin. and S. Comm. on Homeland Sec. and Governmental Aff. Interview of Amos Hochstein Testimony (Sept. 17, 2020), <https://www.hsgac.senate.gov/imo/media/doc/2020-09-17-Hochstein%20Interview%20with%20Exhibits.pdf>; *See also* Hochstein Interview Errata <https://www.hsgac.senate.gov/imo/media/doc/Unified%20Hochstein%20Transcript%20Errata.pdf>.

<sup>15</sup> Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18, 2019) at 188, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>.

<sup>16</sup> In its Dec. 18, 2019 letter to our Committees, Ms. Tramontano explained that the meeting with Mr. Laitinen “had not been scheduled to discuss Burisma as we had several other corporate clients interested in Ukraine’s economic situation. To be fully transparent, we disclosed that we were working with Burisma and inquired as to his views of the company.” *See* Letter from Karen Tramontano, Chief Executive Officer, Blue Star Strategies, to Chairman Ron Johnson, S. Comm. on Homeland Sec. and Governmental Aff., and Chairman Charles Grassley, S. Comm. on Fin. (Dec. 18, 2019) at 188, <https://www.hsgac.senate.gov/imo/media/doc/2020-08-28-Tramontano%20Interview%20with%20Exhibits.pdf>.

4. December 8, 2016, meeting with U.S. Ambassador Marie Yovanovitch;
5. December 14, 2016, meeting with State Department official Reggie Singh;
6. November 2, 2017, meeting with Energy Department official Andrea Lockwood;
7. November 21, 2018, meeting with State Department officials Melissa Simpson and Brian DaRin;
8. November 27, 2018, meeting with Commerce Department officials Matthew Edwards and Boris Chumuk; and
9. February 19, 2019, meeting with Energy Department officials Charles Phillips and Heather Bell.

DOJ must scrutinize Blue Star Strategies' recently filed FARA forms given the firm's apparent incomplete disclosures and its lack of consistency with our investigative records, which are based, in significant part, on Blue Star Strategies' representations to Congress.

Accordingly, we request DOJ provide the following information:

1. Please provide all letters of inquiry and letters of determination DOJ sent to Blue Star Strategies, its officials and affiliated entities.
2. Did Blue Star Strategies, its officials or any affiliated entity request an advisory opinion from DOJ with respect to registering as a foreign agent? If so, please provide a copy of the request and opinion.
3. During DOJ's review of Blue Star Strategies' obligation to register under FARA, did it review whether or not Blue Star Strategies shared informational material with U.S. government officials? If so, what was found? If not, why not? Please provide all copies.
4. Was DOJ aware of the nine meetings Blue Star Strategies did not disclose on their May 12, 2022, FARA form?
5. Did DOJ review whether John Buretta should register under FARA for his work on behalf of Burisma and Mr. Zlochevsky? If so, what did it conclude? If not, why not?
6. How will DOJ address Blue Star Strategies' apparent incomplete FARA filings?
7. How will DOJ determine whether Blue Star Strategies' apparent inconsistencies and inaccuracies in its FARA filing—as described in this letter—were deliberate?
8. How will DOJ hold Blue Star Strategies officials accountable if it determines those officials made deliberately inconsistent and inaccurate disclosures on FARA forms?

Please provide this information as soon as possible but no later than June 6, 2022. Thank you for your attention to this matter.

Sincerely,



Ron Johnson  
Ranking Member  
Permanent Subcommittee on Investigations



Charles E. Grassley  
Ranking Member  
Committee on the Judiciary

cc: The Honorable Jon Ossoff  
Chairman  
Permanent Subcommittee on Investigations

The Honorable Richard Durbin  
Chairman  
Committee on the Judiciary

The Honorable Michael Horowitz  
Inspector General  
Department of Justice