



October 16, 2025

Joseph V. Cuffari
Inspector General, U.S. Department of Homeland Security
Attn: Office of Investigations - Hotline
245 Murray Lane SW
Washington, DC 20528-0305

submitted via hotline

Dear Inspector General Cuffari:

Campaign Legal Center (“CLC”) writes to request that the U.S. Department of Homeland Security (“DHS”) Office of Inspector General (“IG”) investigate whether Senior Advisor Mark Hall violated ethics laws by participating in contracting decisions involving his former employer, SE&M Solutions, which advises companies seeking government contracts.¹ Specifically, SE&M paid Hall \$50,000 for approximately one month of consulting work immediately before Hall entered government. A few months later, Hall reportedly assisted his former employer with a client’s bid for a government contract.² An investigation is warranted to determine whether Hall improperly participated in matters involving his former employer, in violation of recusal requirements under federal law.

The need for an investigation is particularly urgent due to the timing and nature of the circumstances surrounding Hall’s conduct. First, it was reported that DHS Border Czar, Tom Homan, was allegedly soliciting payments to help award businesses with government contracts, which resulted in undercover FBI agents giving him \$50,000 soon before Homan joined DHS.³ Next, it was reported that

¹ *About Us*, SE&M Solutions, <https://semsolutionsllc.com/about/> (last visited Oct. 15, 2025).

² Avi Asher-Schapiro, Jeff Ernsthausen & Mica Rosenberg, *Trading on Tom Homan: Inside the Push to Cash in on the Trump Administration’s Deportation Campaign*, PROPUBLICA (Oct. 1, 2025), <https://www.propublica.org/article/tom-homan-border-czar-trump-mark-hall-charles-sowell>.

³ Devlin Barrett et al., *Trump Justice Dept. Closed Investigation Into Tom Homan for Accepting Bag of Cash*, N.Y. TIMES (Sept. 20, 2025), <https://www.nytimes.com/2025/09/20/us/politics/tom-homan-fbi-trump.html>.

Hall received \$50,000 from a source the month before he joined DHS and then he allegedly helped the source with a potential government contract. These transactions raise disturbing questions about senior officials at DHS that require an investigation to provide the public with information on whether violations occurred.

Members of the federal executive branch are expected to perform their duties impartially, avoiding even the appearance of a conflict of interest, to preserve the public's trust in government. When a senior official is involved in contracting decisions that stand to benefit a recent former employer, it raises serious questions about whether government decision making is impartial. The IG should investigate this matter and determine whether Hall violated federal ethics laws.

Employees Must Recuse from Matters Where Their Impartiality Could Be Questioned

All executive branch employees are subject to ethics rules contained in the Standards of Ethical Conduct, which call on employees to avoid even the appearance that they are violating ethical standards.⁴ The impartiality regulation sets guidelines for how employees can avoid the appearance of favoritism in government decision making, and requires employees to consider appearance concerns before participating in a particular matter.⁵ An employee should refrain from participating in matters where a reasonable person with knowledge of the relevant facts would question the employee's impartiality.⁶

The regulation specifies that “[w]hen an employee knows that a person with whom the employee has a covered relationship is or represents a party to a particular matter involving specific parties, and the employee determines that the circumstances would cause a reasonable person with knowledge of the relevant facts to question their impartiality in the matter, the employee should not participate in the matter,” unless they receive prior authorization from agency ethics officials.⁷

An employee has a covered relationship with “any person for whom the employee has, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee.”⁸ A covered relationship also covers anyone “with whom the employee has or seeks a business, contractual, or other financial relationship that involves other than a routine consumer transaction.”⁹

⁴ 5 C.F.R. § 2635.101(b)(14).

⁵ *Id.*

⁶ 5 C.F.R. § 2635.502(a).

⁷ *Id.* § 2635.502(a)(2).

⁸ *Id.* § 2635.502(b)(1)(iv).

⁹ *Id.* § 2635.502(b)(1)(i).

A particular matter involving specific parties “includes any judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, arrest or other particular matter involving a specific party or parties.”¹⁰ An “isolatable transaction or related set of transactions between identified parties” typically would be considered a particular matter involving specific parties.¹¹

Additionally, employees must recuse from “any particular matter involving specific parties in which the employee’s former employer is a party or represents a party if the employee received a covered payment from that person,” for a period of two years after that payment is received.¹² A covered payment is any item with a value of more than \$10,000 that is paid “[o]n the basis of a determination made after it became known to the former employer that the individual was being considered for or had accepted a Government position.”¹³

Hall Has a Covered Relationship with Charles Sowell and SE&M Solutions

Hall has a covered relationship with Sowell and his consulting company, SE&M Solutions because he was a consultant for Sowell’s company. An employee has a covered relationship with “[a]ny person for whom the employee has, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee.”¹⁴

Hall was appointed as Senior Advisor at DHS on February 24, 2025. On his new entrant financial disclosure report, filed in its revised form on April 11, 2025, Hall lists SE&M Solutions as his employer from January to February 2025.¹⁵ During those two months, Hall was paid \$50,000 in salary for his work as a “consultant.”¹⁶ He lists SE&M as a source of compensation on his financial disclosure, but he does not note which of his listed clients, if any, were clients of SE&M.

SE&M Solutions is a Harrisburg, Pennsylvania-based consulting firm that “hopes to secure local and federal contracts using the best experts in the government consulting industry.”¹⁷ The company “provides professional services and information technology support to personnel vetting, migrant/refugee,

¹⁰ 5 C.F.R. § 2640.102(l).

¹¹ *Id.*

¹² 5 C.F.R. § 2635.503(a).

¹³ *Id.* at (b)(1).

¹⁴ 5 C.F.R. § 2635.502(b)(1)(iv).

¹⁵ New Entrant Report for Mark Hall, Form 278e (Apr. 11, 2025), <https://www.documentcloud.org/documents/25969181-mark-hall-dhs-278/>.

¹⁶ *Id.*

¹⁷ *About Us*, SE&M Solutions, *supra* note 1.

cybersecurity missions, and project management.”¹⁸ Charles Sowell is the founder and CEO of SE&M and Sowell is the only personnel listed on SE&M’s website.¹⁹

Hall has a covered relationship with both Sowell and SE&M Solutions because Hall served as a consultant for a consulting firm solely owned and operated by Sowell.

Hall Apparently Participated in a Particular Matter Involving a Client Represented by Sowell and SE&M Solutions

Hall appears to have participated in a particular matter where SE&M, with whom he has a covered relationship, represents a party: SE&M’s client Industrial Tent Systems. Hall was involved in the contracting process and reportedly met with Sowell to discuss possible contracts. Contracts are per se particular matters involving specific parties.²⁰ Negotiations for contracts, and procurement processes where steps have been taken to secure contractors and parties have expressed interest in the contract also are considered particular matters involving specific parties.²¹ Sowell and SE&M Solutions are representing a party to these particular contracting matters.

The Trump administration’s increased focus on immigration has made detention-related contracts highly competitive and lucrative. In mid-August 2025, Hall and Sowell allegedly visited the Houston office of one potential contractor, Industrial Tent Systems. Industrial Tent Systems is a client of SE&M Solutions²² and specializes in “turnkey operations for temporary facilities.”²³ According to reporting, Hall attended this meeting “to hear the company’s leaders pitch their plan to use their tents and services for immigration detention,” and sample meals that they planned to serve future detainees.²⁴

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ 5 C.F.R. § 2640.102(l).

²¹ See U.S. Off. of Gov’t Ethics, OGE 90x12 (procurement where a number of steps towards the procurement had been taken and parties had affirmatively expressed interest is considered a particular matter involving specific parties).

²² Asher-Schapiro et al., *supra* note 2.

²³ *Who We Are*, Bolton Holdings LLC, <https://boltonholdingsllc.com/about/> (last visited Oct. 15, 2025). Bolton Holdings LLC is the holding company for Industrial Tent Systems.

²⁴ Asher-Schapiro et al, *supra* note 2.

In September, the Department of War (previously known as the Department of Defense) selected 59 companies qualified to compete for immigration detention contracts.²⁵ Industrial Tent Systems was one of those companies.²⁶

Hall's apparent participation in a meeting with Sowell and his client to discuss plans to compete for a contract constitutes participation in a particular matter involving specific parties because SE&M is representing a party.

Hall May Have Been Required to Recuse from Contract Negotiations with Sowell and SE&M Clients

Hall may have been required to recuse from contract negotiations involving Sowell and SE&M's clients because a reasonable person would have cause to question Hall's impartiality in the contracting decision process and when a former consulting employer was on the other side of the negotiation. Hall was recently employed by Sowell's consulting firm, just before entering government. While his employment was short-lived, it was lucrative: he earned \$50,000 for approximately one month of work.²⁷ The timing and profitability of that working relationship and the nature of Sowell's consulting firm as a vehicle for getting his client's government contracts raises serious questions about whether he could impartially assess the services on offer.

Hall Also May Be Required to Recuse from Matters Involving SE&M and Sowell Because of Past Consulting Payments

Federal law requires employees to recuse from particular matters involving specific parties where the employee's former employer is a party or represents a party if the employee received a covered payment from that person, for a period of two years after that payment is received.²⁸ A covered payment must be more than \$10,000 and paid after it became known to the former employer "that the individual was being considered for or had accepted a Government position."²⁹

Hall, Sowell, and Tom Homan, DHS's Border Czar, have had a close working relationship for years. Both Homan and Sowell serve on the board of the Border911

²⁵ Fola Akinnibi, Rachel Adams-Heard & Sophie Alexander, *Trump's Border Czar Involved in Detention Contract Talks Despite Recusal*, BLOOMBERG (Sept. 24, 2025), <https://www.bloomberg.com/news/features/2025-09-24/trump-s-border-czar-tom-homan-involved-in-detention-contract-talks>.

²⁶ *Contracts for Sept. 4, 2025*, U.S. Dep't of War, <https://www.war.gov/News/Contracts/Contract/Article/4294148/> (last visited Oct. 16, 2025).

²⁷ New Entrant Report for Mark Hall, *supra* note 15.

²⁸ 5 C.F.R. § 2635.503(a).

²⁹ *Id.* at (b)(1)(i).

Foundation.³⁰ Sowell may have known that Hall would be tapped for a role at DHS before SE&M paid Hall \$50,000 during the two months prior to his appointment.

The IG needs to conduct an investigation to determine whether the consulting fees paid to Hall by Sowell's company in January of this year, shortly before Hall was appointed to DHS in February, meet the definition of a covered payment for purposes of the ethics laws.

Conclusion

Publicly available information shows that Hall participated in a particular matter involving Sowell's consulting firm, with whom he has a covered relationship. Because his impartiality was likely to be questioned in matters related to his former employer who he consulted for, he should have recused himself. Further, Sowell's firm made payments to Hall that likely required recusal from matters involving SE&M for a period of two years after the payments were made.

An IG investigation is needed to determine whether Hall's actions violate federal ethics laws.

Respectfully submitted,

_____/s/_____
Kedric L. Payne
General Counsel, Vice President, and Sr.
Director, Ethics

_____/s/_____
Delaney Marsco
Director, Ethics

³⁰ *Thomas D. Homan*, Border911 Foundation, <https://border911foundationinc.org/thomas-d-homan/> (last visited Oct. 15, 2025); *Charles Sowell*, Border911 Foundation, <https://border911foundationinc.org/charles-sowell/> (last visited Oct. 15, 2025).