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(Original Signature of Member)

119TH CONGRESS
2D SESSION

H. RES. _____

Impeaching Kristi Lynn Arnold Noem, Secretary of Homeland Security, for
high crimes and misdemeanors.

IN THE HOUSE OF REPRESENTATIVES

Ms. KELLY of Illinois submitted the following resolution; which was referred
to the Committee on _____

RESOLUTION

Impeaching Kristi Lynn Arnold Noem, Secretary of
Homeland Security, for high crimes and misdemeanors.

1 *Resolved*, That Kristi Lynn Arnold Noem, Secretary
2 of Homeland Security of the United States of America,
3 is impeached for high crimes and misdemeanors, and that
4 the following articles of impeachment be exhibited to the
5 United States Senate:

6 Articles of impeachment exhibited by the House of
7 Representatives of the United States of America in the
8 name of itself and of the people of the United States of
9 America, against Kristi Lynn Arnold Noem, Secretary of

1 Homeland Security of the United States of America, in
2 maintenance and support of its impeachment against her
3 for high crimes and misdemeanors.

4 ARTICLE I: OBSTRUCTION OF CONGRESS

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6 The Constitution provides that the House of Rep-
7 resentatives “shall have the sole Power of Impeachment”
8 and that civil Officers of the United States, including the
9 Secretary of Homeland Security, “shall be removed from
10 Office on Impeachment for, and Conviction of, Treason,
11 Bribery, or other high Crimes and Misdemeanors”. In her
12 conduct while Secretary of Homeland Security, Kristi
13 Lynn Arnold Noem, in violation of her oath to support
14 and defend the Constitution of the United States against
15 all enemies, foreign and domestic, to bear true faith and
16 allegiance to the same, and to well and faithfully discharge
17 the duties of her office, has willfully and systematically
18 refused to comply with the law, in that—

19 (1) Kristi Lynn Arnold Noem willfully violated
20 Public Law No. 118-47 which states no funds ap-
21 propriated to Department of Homeland Security
22 “may be used to prevent” “a Member of Congress”
23 “from entering, for the purpose of conducting over-
24 sight, any facility operated by or for the Department
25 of Homeland Security used to detain or otherwise
26 house aliens” and to comply with Section 527 of the

1 fiscal year 2024 Department of Homeland Security
2 Appropriations Act, as incorporated in Public Law
3 No. 118-47, which specifically provides that it may
4 not “be construed to require a Member of Congress
5 to provide prior notice of the intent to enter a De-
6 partment of Homeland Security facility” used to de-
7 tain or otherwise house noncitizens “for the purpose
8 of conducting oversight.”

9 (2) Without any congressional revision to the
10 text of Section 527, Kristi Lynn Arnold Noem im-
11 plemented a scheme on May 13, 2025, to require no-
12 tice “a minimum of seven (7) calendar days in ad-
13 vance to schedule visits to Department of Homeland
14 Security detention facilities,” absent authorization
15 by the Secretary. In an attempt to hide Department
16 of Homeland Security activities, Members of Con-
17 gress continued to be refused entry to Department
18 of Homeland Security facilities in incidents such as:

19 (A) On July 8–9, 2025, a Representative
20 from Texas requested to visit the El Paso Serv-
21 ice Processing Center. Immigration and Cus-
22 toms Enforcement refused to accommodate the
23 July 9 oversight visit because she did not pro-
24 vide the required seven days’ advance notice,
25 and she was denied entry on July 9, 2025.

1 (B) On July 20, 2025, a Representative
2 from Colorado attempted an oversight visit to
3 the ICE detention facility in Aurora, Colorado.
4 ICE denied him entry on the basis that he had
5 not provided seven calendar days' advance no-
6 tice.

7 (C) On July 7, 2025, a Representative
8 from California sought to inspect the Los Ange-
9 les ICE Field Office. ICE refused to permit the
10 visit, asserting that the facility was not a "de-
11 tention facility" subject to Section 527 over-
12 sight, despite noncitizens being held at the fa-
13 cility, pursuant to Section 527.

14 (D) On June 17, 2025, a Representative
15 from New York attempted to visit the New
16 York ICE Field Office. ICE refused to permit
17 the visit, asserting that the facility was not a
18 "detention facility" subject to Section 527 over-
19 sight, despite noncitizens being held at the fa-
20 cility, pursuant to Section 527.

21 (E) On July 21, 2025, Representatives
22 from Colorado, Mississippi, and Maryland ar-
23 rived at the Washington ICE Field Office in
24 Chantilly, Virginia to conduct oversight after
25 learning that individuals were being held there.

1 ICE refused to permit the visit, asserting that
2 the facility was not a “detention facility” sub-
3 ject to Section 527 oversight, despite nonciti-
4 zens being held at the facility, pursuant to Sec-
5 tion 527.

6 (F) On August 30, 2025, a Representative
7 from Washington visited the Northwest ICE
8 Processing Center in Tacoma, Washington to
9 conduct Congressional oversight. Upon arrival,
10 they were denied entry without explanation

11 (3) Kristi Lynn Arnold Noem’s willfully violated
12 the Impoundment Control Act of 1974 where, under
13 her supervision, the Federal Emergency Manage-
14 ment Agency withheld funds obligated by Congress.
15 According to Government Accountability Office re-
16 port B-337204.2, FEMA withheld funding for the
17 Emergency Food and Shelter Program and the Shel-
18 ter and Services Program in violation of the Im-
19 poundment Control Act. When the Government Ac-
20 countability Office contacted Secretary Noem, her
21 team refused to provide additional information on
22 the funds withheld.

23 ARTICLE II: VIOLATION OF PUBLIC TRUST

24

25 The Constitution provides that the House of Rep-
26 resentatives “shall have the sole Power of Impeachment”

1 and that civil Officers of the United States, including the
2 Secretary of Homeland Security, “shall be removed from
3 Office on Impeachment for, and Conviction of, Treason,
4 Bribery, or other high Crimes and Misdemeanors”. In her
5 conduct while Secretary of Homeland Security, Kristi
6 Lynn Arnold Noem, in violation of her oath to well and
7 faithfully discharge the duties of her office, has breached
8 the public trust, in that:

9 (1) Kristi Lynn Arnold Noem has repeatedly
10 violated the Immigration and Nationality Act, the
11 First and Fourth Amendments of the United States
12 Constitution, and due process rights of American
13 citizens by directing Immigration and Customs En-
14 forcement to make widespread warrantless arrests,
15 forgo due process, and use violence against United
16 States citizens, lawful residents, and other individ-
17 uals. Kristi Lynn Arnold Noem engaged in this con-
18 duct by the following means.

19 (A) In October 2025, a United States Dis-
20 trict Court Judge from the Northern District of
21 Illinois found that Immigration and Customs
22 Enforcement had arrested 22 individuals with-
23 out a warrant in violation of the Castañon Nava
24 settlement agreement in early 2025.

1 (B) In September of 2025, ICE raided
2 7500 S. South Shore Drive in Chicago, claim-
3 ing that the building was occupied by members
4 of the transnational crime organization, Tren
5 de Aragua. During the warrantless raid, federal
6 agents used military-style tactics to raid apart-
7 ments, dragging United States citizens, military
8 veterans, and seniors out of their apartments in
9 zip ties and detaining residents, several U.S.
10 citizens, for hours. After the raid, residents re-
11 turned to damaged apartments and stolen
12 items.

13 (C) On October 22, 2025, ICE agents used
14 tear gas on children having a Halloween parade
15 in Chicago, violating order No. 25 C 12173
16 issued by U.S. District Court Judge, Sara Ellis
17 restricting ICE and Customs and Border Pro-
18 tection agents from using non-lethal munitions
19 without warning and justification. Another vio-
20 lation of U.S. District Judge Ellis' order came
21 on October 14, 2025, ICE and CBP agents
22 used tear gas on a peaceful crowd. The crowd
23 had formed after a federal agent crashed into
24 a vehicle. After Chicago police arrived on the
25 scene, responding to reports of a car accident,

1 ICE agents deployed tear gas on residential
2 streets and near a grocery store. This exposed
3 police officers, elderly adults, and children as
4 young as 1 to harmful gases.

5 (D) Masked and militarized patrols of fed-
6 eral agents have taken to the streets of Chicago
7 as part of “Operation Midway Blitz” in a sys-
8 temic violation of rights at the direction of
9 Kristi Lynn Arnold Noem. These agents used
10 excessive force, including, shooting an unarmed
11 United States citizen in Chicago who was part
12 of a convoy of civilian vehicles following federal
13 agents. According to body camera footage, an
14 agent driving next to the vehicles was yelling
15 obscenities and struck the victim’s car – pro-
16 ceeding to fire five shots at the unarmed driver.
17 The Department of Homeland Security, under
18 Kristi Lynn Arnold Noem, falsely accused the
19 victims of aggressively driving into the federal
20 agents despite video evidence.

21 (E) On January 7, 2026, an ICE agent
22 fired his weapon at a vehicle attempting to get
23 out of the way of agents, killing the driver, a
24 U.S. Citizen. Despite video showing the officer
25 on the side of the vehicle while firing and the

1 vehicle was moving away from the officer on the
2 second and third shots, Kristi Lynn Arnold
3 Noem is claiming publicly that the officer was
4 in danger and in front of the vehicle when he
5 fired.

6 ARTICLE III: SELF-DEALING

7

8 (a) Kristi Lynn Arnold Noem has violated 5 C.F.R.
9 pt. 2635, Misuse of Position by using her position for per-
10 sonal gain while inappropriately using taxpayer dollars,
11 when:

12 (1) Kristi Lynn Arnold Noem is using her posi-
13 tion to circumvent the federal contracting process
14 and funneling federal funds to her friends' busi-
15 nesses. Kristi Lynn Arnold Noem used the cover of
16 a national emergency to bypass the competitive bid-
17 ding process and direct federal dollars to close asso-
18 ciates. Secretary Noem used taxpayer dollars to fund
19 a \$200 million ad campaign for recruiting ICE
20 agents Kristi Lynn Arnold Noem used the "national
21 emergency" declared at the southern border to by-
22 pass the normal contract process, which included
23 competitive bidding, to award multi-million dollar
24 contracts to republican-led ad agencies. One such
25 contractor which was formed days prior to the
26 award, subcontracted with the Strategy Group, a

- 1 company run by the husband of senior DHS official,
- 2 Tricia McLaughlin and a close friend of Kristi Lynn
- 3 Arnold Noem.