

HOUSE FOREIGN AFFAIRS COMMITTEE MINORITY
SUBCOMMITTEE ON EUROPE

PAY FOR PLAY IN THE BALKANS

HOW THE TRUMP ADMINISTRATION'S BOSNIA POLICY
ENRICHES THE PRESIDENT'S PERSONAL ALLIES AND
SHORTCHANGES THE AMERICAN PEOPLE



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EXECUTIVE SUMMARY

Since returning to the Oval Office in January 2025, President Trump, his family, and his political allies have gifted billions from the Presidency. In the Western Balkan nation of Bosnia and Herzegovina, President Trump and his administration have made two corrupt decisions that have netted more than \$1 billion for President Trump's political allies, undermined Bosnia's path to European integration, and threatened the stability of the entire region.

First, in October 2025, President Trump removed longstanding bipartisan sanctions from Bosnian Serb leader Milorad Dodik, his family, and his friends – a decision that has since proven questionable given Dodik's continued destabilizing rhetoric and actions that undermine Bosnia's sovereignty, territorial integrity, and multi-ethnic character. Second, the Trump administration concurrently facilitated the awarding of a concession worth over \$1 billion for Bosnia's politically sensitive Southern Interconnection Gas Pipeline (SIC) to a company with no regional or sectoral experience. That company, AAFS Infrastructure and Energy LLC (AAFS), was hastily established by political allies of the President just four days after the State Department first posted publicly expressing its interest in an American company taking over the concession for the pipeline. These two decisions have grossly undermined the Dayton Peace Accords (DPA), which have secured Bosnia and Herzegovina's stability for more than 30 years. Furthermore, these two decisions have weakened institutions like the Office of the High Representative (OHR) in Bosnia, an office tasked with overseeing the civilian implementation of the Dayton Peace Accords, and upended nuanced negotiations on issues like state property that threaten Bosnia's fragile peace.

As Ranking Member of the House Foreign Affairs Subcommittee on Europe, I believe Congress must conduct detailed and comprehensive oversight of this Administration to fight back against this President's corrupt actions and demand accountability on behalf of the American people. Yet House and Senate Republicans, who control both chambers of Congress, have effectively relinquished their constitutional oversight responsibilities.

This report is one part of House Democrats' efforts to conduct meaningful oversight on the Trump administration's corrupt policies including in Bosnia and Herzegovina. Key findings include:

1. The Trump administration's policy towards Bosnia and Herzegovina undermines 30 years of bipartisan U.S. strategy, threatens regional stability, enriches the President's friends and allies, empowers Russia, and places the Dayton Peace Accords at risk.
2. The Trump administration's decision to remove sanctions on Milorad Dodik, his family, and his affiliates was deeply misguided and corrupt. By removing all the sanctions on Dodik, his family, and his affiliates, the Trump administration lost all leverage it had over Dodik without advancing long-term U.S. interests in Bosnia.
3. Following the delisting, Milorad Dodik has maintained his inflammatory rhetoric and secessionist actions that undermine regional stability (allegedly a key Trump administration priority), the Dayton Peace Accords, the Office of the High Representative, and Bosnia and Herzegovina's sovereignty, territorial integrity, constitutional order, and multi-ethnic character.

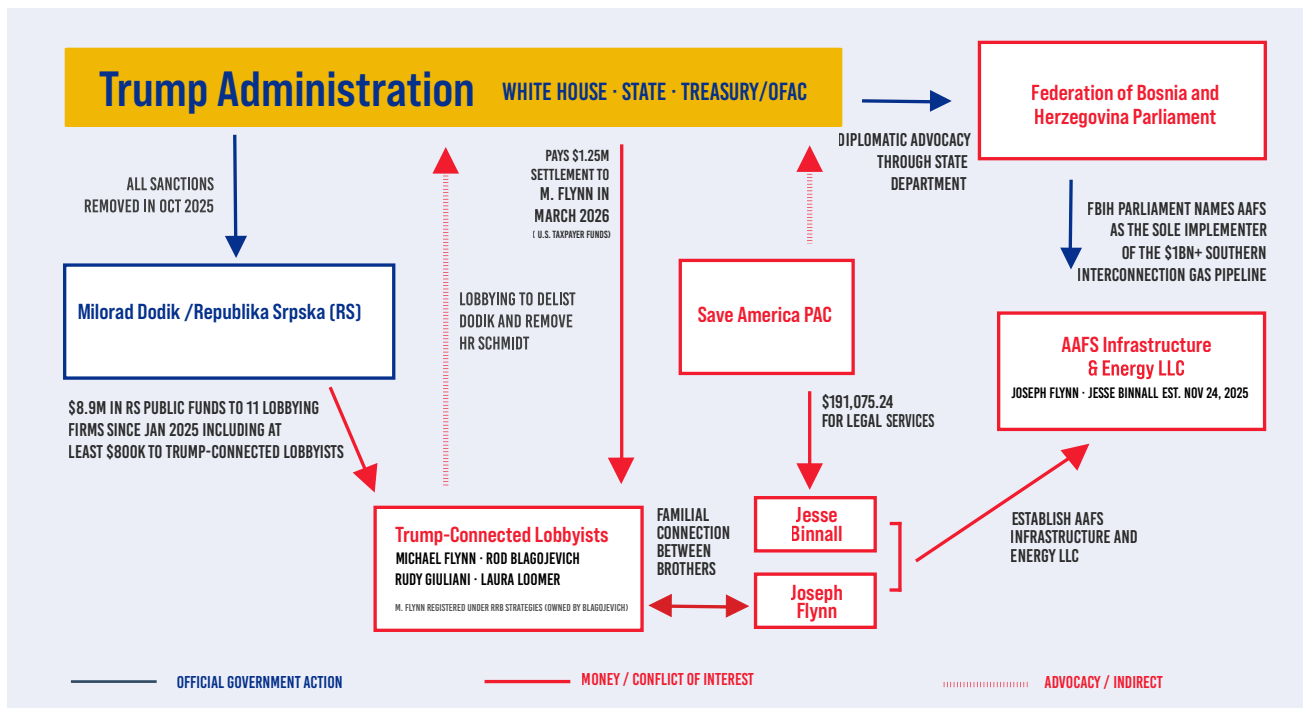
4. The Trump administration lobbied Bosnian state- and entity-level officials to award the concession contract for the Southern Interconnection Gas Pipeline to AAFS Energy & Infrastructure LLC, a company with no regional or sectoral experience founded by President Trump's political cronies. The administration has therefore provided Trump affiliates Joseph Flynn and Jesse Binnall with a potential \$1 billion concession.
5. By pressuring Bosnian officials to award the concession for the SIC to an unqualified company like AAFS, Trump administration officials have put their own financial interests over the interests of the Bosnian state and U.S. national security, thereby weakening Bosnia's state-level institutions and further strengthening a now de-listed Milorad Dodik.
6. The Trump administration now has the potential to use a weakened High Representative, an emboldened Milorad Dodik, and economic pressure related to the Southern Interconnection Gas Pipeline to resolve the issue on state property in an expedited manner that would undermine the Dayton Accords, inflame ethnic tensions, and threaten U.S. interests in the region.

To reverse the Trump administration's foreign policy in Bosnia, the report outlines numerous policy and oversight recommendations for the Trump administration, the Republican-controlled Congress, the European Union, and civil society. Key recommendations are summarized below:

1. President Trump must reimpose sanctions on Milorad Dodik, his family, and his affiliates for undermining the Dayton Peace Accords in accordance with the recently passed Western Balkans Democracy and Prosperity Act (Sec. 8335 of P.L. 119-60).
2. House and Senate Republicans, who control the majority in both chambers and hold subpoena power, must compel the testimony of administration officials regarding the administration's policies towards Bosnia and Herzegovina, the removal of Dodik sanctions, the facilitation of the SIC pipeline contract, and the present-day implementation of the Dayton Peace Accords.
3. The State Department should consider pausing its advocacy for AAFS and work with the U.S. interagency and state- and entity-level authorities in Bosnia to find a legitimate American company capable of building, operating, and maintaining the SIC pipeline.
4. The European Union should develop an EU-wide sanctions regime against Dodik, his enablers, and others destabilizing Bosnia and Herzegovina and the region, following the lead of its own member states that have imposed their own restrictive measures.
5. Given the still unfilled position of the High Representative, the Trump administration should quickly engage with allies and partners on the Peace Implementation Council to choose a new High Representative who will defend the Dayton Peace Accords and uphold Bosnia's territorial integrity and multi-ethnic character as well as facilitate broader reforms in line with Bosnia's EU and NATO aspirations.

As Americans suffer from the President's disastrous tariff policy and his misguided war of choice in Iran, the President's friends and allies continue to profit through opaque business deals and official policy decisions that result in lucrative contracts. As Ranking Member of the House Foreign Affairs Subcommittee on Europe, I will continue to fight back against these corrupt policies and hold this administration accountable.

TRUMP ADMINISTRATION CONNECTIONS WITH MILORAD DODIK AND THE SOUTHERN GAS INTERCONNECTION PIPELINE:



INTRODUCTION

In Bosnia and Herzegovina (BiH) in the Western Balkans, President Trump has pursued a corrupt foreign policy in which his friends, family, and affiliates stand to make millions of dollars while undermining U.S. interests and risking the fragile peace established by the U.S.-brokered Dayton Peace Accords (DPA). As this report will outline, Bosnia is a salient example of how President Trump has corrupted the presidency and how Secretary Marco Rubio's State Department is using American taxpayer dollars to enrich a lucky few within the President's inner circle.

As Ranking Member of the House Foreign Affairs Subcommittee on Europe, I believe the United States Congress must hold any President accountable for his or her actions. I believe holding President Trump accountable means calling out his corrupt practices in Europe that benefit him as well as his friends and family. It means condemning the President's hostile approach to America's relationship with NATO and the European Union and his inability to call out the Kremlin for its illegal war of aggression in Ukraine. It also means passing important bipartisan legislation like the Western Balkans Democracy and Prosperity Act, which passed in the Fiscal Year 2026 National Defense Authorization Act and requires mandatory sanctions on those who undermine the DPA in the Western Balkans.

In Bosnia and Herzegovina, two corrupt decisions have enriched Donald Trump's personal friends and cronies while undermining regional stability and longstanding U.S. policy towards the country:

- First, in October 2025, President Trump removed all sanctions on separatist Republika Srpska leader Milorad Dodik and his associates.
- Second, shortly after the de-listing, the Trump administration successfully facilitated legislation awarding the sole concession for the construction and operation of the Southern Interconnection Gas Pipeline (SIC) to two Trump loyalists with no sectoral or regional experience.

This oversight and investigatory report outlines the who, what, where, when, and how of President Trump's corrupt policy in Bosnia and Herzegovina. It brings to light evidence demonstrating that the administration's unilateral and opaque decisions do not match its public statements and policy proposals. This report shows how U.S. government resources are being wasted in Bosnia and Herzegovina, how President Trump and his cronies are upending the 1995 DPA and 30 years of U.S. policy towards the region, and how President Trump has rewarded his affiliates with taxpayer-funded settlements and support. Finally, the report provides recommendations for the Trump administration, Congress, and European countries to reassert a positive, pro-European, forward-looking, and measured policy in Bosnia and Herzegovina that recognizes the harms of President Trump's corrupt decisions while protecting Bosnia's sovereignty, territorial integrity, and multi-ethnic character.

While this report focuses on two corrupt Trump administration policies in Bosnia, many other decisions from this administration deserve their own investigations, including a self-reported \$1 billion in personal revenue since coming into office in 2025¹ and the provision of advanced semiconductors to the United Arab Emirates shortly after securing a lucrative investment in the Trump co-owned venture World Liberty Financial.² Unfortunately, the Republican majority in Congress, a co-equal branch of government, has been unwilling to pursue investigations to hold the President accountable. This lack of accountability must

¹ Julia Manchester, "Trump responds to eye-popping report on crypto profits while president," *The Hill*, July 1, 2026, <https://thehill.com/business/5949292-donald-trump-gaggle-crypto-disclosure-report/>

² Eric Lipton et al., "Anatomy of Two Giant Deals: The U.A.E. Got Chips. The Trump Team Got Crypto Riches." *The New York Times*, September 15, 2025, <https://www.nytimes.com/2025/09/15/us/politics/trump-uae-chips-witkoff-world-liberty.html>

change, and this report on the administration's corrupt dealings in Bosnia and Herzegovina is a first step.

WHO IS INVOLVED, AND WHY DOES IT MATTER TO U.S. INTERESTS?

To examine the Trump administration's bilateral relationship with Bosnia and Herzegovina as well as the corrupt decisions to remove sanctions on Dodik and facilitate the concession contract for the Southern Interconnection Gas Pipeline to a Trump-affiliated company, it is necessary to understand U.S. interests and the characters involved.

WHY BOSNIA MATTERS TO THE UNITED STATES

As Ranking Member of the House Foreign Affairs Subcommittee on Europe, I believe ensuring a stable Bosnia and Herzegovina and the maintenance of the DPA is a key U.S. priority in the Western Balkans and important for furthering stability in the region. As I stated during a December 2, 2025, Europe Subcommittee hearing, "Dayton continues to underpin Bosnia's sovereignty, territorial integrity, and multi-ethnic character and I believe the U.S. must continue to support it as an instrument to supporting Bosnia's future."³

For decades, bipartisan administrations have agreed that an active United States has been key to maintaining regional stability in the Western Balkans and upholding the core tenets of the DPA. Furthermore, bipartisan administrations have recognized that the United States must use its political and diplomatic heft to facilitate and advocate for resolutions to inter-ethnic and political disagreements that halt destabilizing actors and strengthen Bosnia's sovereignty, territorial integrity, and multi-ethnic character. Anything less would run counter to U.S. national security.

For as challenging as it was to agree to the DPA in 1995, many politicians in Bosnia and Herzegovina have continued to try to take advantage of the Accords for their own short-term political gain. Often, these actions have directly threatened U.S. interests in Sarajevo and throughout the region or opened the door for outside interests, including those from Moscow, to gain an upper hand.

Today, I believe the U.S. must continue to play an active role in Bosnia and Herzegovina. From those advocating for a

³ House Foreign Affairs Committee Democrats, "Flashpoint: A Path Toward Stability in the Western Balkans," YouTube, December 2, 2025, <https://www.youtube.com/live/b6OTytjZysc?t=1327>



third entity in Bosnia and Herzegovina to others calling for secession or supporting the ideals of a “greater Serbia,” the United States has previously been a key actor to push back and ensure the short-term interests of political actors do not overtake the long-term interests of the people of Bosnia and Herzegovina. Yet, President Trump’s decisions in Bosnia have thrown aside decades of bipartisan consensus at the expense of the Bosnian people. The next section in this report provides an overview of the key individuals enabling these corrupt policies.

WHO IS DISRUPTING LONGSTANDING U.S. INTERESTS

MILORAD DODIK: Many of Bosnia’s current troubles stem from the secessionist rhetoric and policies of the current leader of the Alliance of Independent Social Democrats (SNSD) party, Milorad Dodik. Dodik previously served as President of the Bosnian political entity Republika Srpska and has dominated politics for two decades. In 2025, Dodik was removed from office when the Court of Bosnia and Herzegovina ruled that his failure to implement 2023 decisions of the High Representative to Bosnia and Herzegovina violated Article 203a(1) of the Criminal Code of Bosnia and Herzegovina.⁴ Dodik’s criminal offense was part of a broader series of actions he took that undermined Bosnia’s constitutional order, jeopardized the DPA, and ran counter to U.S. interests in Bosnia and Herzegovina.⁵

The United States first sanctioned Dodik, who has long curried favor with Russian President Vladimir Putin, in 2017 at the end of the Obama administration for disrupting the implementation of the Dayton Peace Accords, a designation that the first Trump administration upheld.⁶ The Biden administration subsequently imposed multiple rounds of additional sanctions against Dodik, his family, and his affiliates from January 2022 through January 2025 for destabilizing and corrupt activities.^{7,8} As President Trump entered his second term, Dodik spent millions employing numerous lobbyists whose primary goal was to persuade the Trump administration, despite all of Dodik’s corrupt actions, to remove U.S. sanctions against him. As this report will outline, in October 2025, he was successful.⁹

THE OFFICE OF THE HIGH REPRESENTATIVE (OHR): The Office of the High Representative is central to the Trump administration’s decisions to delist Dodik and to award the SIC contract to AAFS. The High Representative for Bosnia and Herzegovina is a position established by the DPA to implement civilian aspects of the peace settlement. The High Representative was further granted “Bonn Powers” in 1997 enabling the person in the position to impose and strike legislation and to dismiss public officials who obstruct the DPA. Following Dodik’s previous failure to implement decisions of the OHR, he and his SNSD party escalated a campaign to criticize and undermine the authority of the OHR as well as the DPA.¹⁰ Dodik’s campaign only further undermined U.S. interests and regional stability in the Balkans and led directly to the Biden administration’s multiple rounds of sanctions against him.

Today, Principal Deputy High Representative Louis Crishock is serving as the acting High Representative following the former

4 Office of the High Representative, “67th report of the High Representative for Implementation of the Peace Agreement on Bosnia and Herzegovina to the Secretary-General of the UN,” Office of the High Representative, May 6, 2025, <https://www.ohr.int/67th-report-of-the-high-representative-for-implementation-of-the-peace-agreement-on-bosnia-and-herzegovina-to-the-secretary-general-of-the-un/?print=pdf>

5 U.S. Department of the Treasury, “U.S. Treasury Targets Four Officials in Bosnia and Herzegovina for Undermining the Dayton Peace Agreement,” U.S. Department of the Treasury, July 31, 2023, <https://home.treasury.gov/news/press-releases/jy1660>

6 U.S. Department of the Treasury, “Treasury Sanctions Republika Srpska Official for Actively Obstructing The Dayton Accords,” U.S. Department of the Treasury, July 17, 2017, <https://home.treasury.gov/news/press-releases/jl0708>

7 For full accounting of Biden administration announcements regarding Milorad Dodik, Republika Srpska, and related actors see: <https://2021-2025.state.gov/western-balkans-sanctions/>

8 U.S. Department of the Treasury, “Treasury Sanctions Milorad Dodik and Associated Media Platform for Destabilizing and Corrupt Activity,” U.S. Department of the Treasury, January 5, 2022, <https://home.treasury.gov/news/press-releases/jy0549>

9 Zdravko Ljubas and Aida Čerkez, “Serb Separatists Paid Millions in Lobbying Campaign that Targeted Diplomat Tasked with Protecting Peace in Bosnia,” OCCRP, May 15, 2026, <https://www.occrp.org/en/feature/serb-separatists-paid-millions-in-lobbying-campaign-that-targeted-diplomat-tasked-with-protecting-peace-in-bosnia>

10 Daria Sito-sucic, “Bosnia’s top court temporarily suspends Serb region’s separatist laws,” Reuters, March 7, 2025, <https://www.reuters.com/world/europe/bosnia-serb-regional-police-drive-out-state-police-separatist-move-2025-03-07/>

High Representative Christian Schmidt's resignation, reportedly at the behest of the Trump administration, effective July 1, 2026.¹¹ The United States and some European partners remain in a diplomatic standoff regarding a permanent High Representative with the Trump administration, backing Italian diplomat Antonio Zannardi Landi.¹² Some European countries have reportedly expressed their concern regarding Landi's fitness for the job and their fear that Landi, and the Trump administration, would do Dodik's bidding.^{13 14} Regardless of who the new High Representative is, a future High Representative will need to apply the Bonn Powers fairly and in accordance with their mandate. Anything less will further Dodik's secessionist rhetoric and undermine U.S. interests in the Balkans.

MICHAEL FLYNN: Appointed National Security Advisor for a short, fraught period in 2017, retired United States Army Lieutenant General Michael Flynn has long peddled conspiracy theories and fomented political violence. In 2017, Flynn pleaded guilty in federal court to a charge of making false statements to the FBI.¹⁵ In the years since, Flynn has supported January 6th rioters and suggested that a coup should have taken place in the United States in 2020.¹⁶ In 2020, President Trump pardoned Flynn for lying to the FBI about his contacts with a Russian official.¹⁷ In March 2026 under the second Trump administration, the U.S. government agreed to pay Flynn \$1.25 million to settle a civil suit in which Flynn alleged that he was wrongfully prosecuted for making false statements to federal agents.¹⁸ These are the same false statements he pleaded guilty to in 2017.

When combined with his previous guilty plea and his retroactive filing under the Foreign Agents Registration Act (FARA) in 2017, Flynn's current FARA-documented connections with the Dodik-controlled Republika Srpska raise significant concerns.¹⁹ In an October 2025 FARA filing, Flynn reported being paid \$100,000 for one month of lobbying on behalf of the Government of Republika Srpska (RS).²⁰ Flynn provided strategic advice and counsel, analysis and information research, and introductions to the RS government. Flynn's lobbying undermines the DPA on behalf of Dodik and the RS government as well as U.S. national security and regional security in the Western Balkans.

While consulting on behalf of RS and Dodik, Flynn has concurrently sought to expand his personal commercial investments and connections in the Serb-dominated Republika Srpska. In May 2026, Flynn's Gold Institute for International Strategy hosted the 'First Annual Economic Summit Europe 2026' in Republika Srpska's administrative center,

11 Julian Borger, "US and European diplomats continue standoff over top Bosnia and Herzegovina post," *The Guardian*, June 30, 2026, <https://www.theguardian.com/world/2026/jun/30/eu-diplomats-clash-with-trump-administration-over-top-bosnia-and-herzegovina-post>

12 Julian Borger, "US and European diplomats continue standoff over top Bosnia and Herzegovina post," *The Guardian*, June 30, 2026, <https://www.theguardian.com/world/2026/jun/30/eu-diplomats-clash-with-trump-administration-over-top-bosnia-and-herzegovina-post>

13 Julian Borger, "US and European diplomats continue standoff over top Bosnia and Herzegovina post," *The Guardian*, June 30, 2026, <https://www.theguardian.com/world/2026/jun/30/eu-diplomats-clash-with-trump-administration-over-top-bosnia-and-herzegovina-post>

14 Zach Rogers, "Deadlocked: the transatlantic rift over the Office of the High Representative in Bosnia and Herzegovina and the future of BiH Energy," *New Eastern Europe*, August 6, 2026, <https://neweasterneurope.eu/2026/08/06/deadlocked-the-transatlantic-rift-over-the-office-of-the-high-representative-in-bosnia-and-herzegovina-and-the-future-of-bih-energy/>

15 NBC News, "Michael Flynn: Timeline of his rise, fall and guilty plea," NBC News, February 14, 2017, <https://www.nbcnews.com/news/us-news/mike-flynn-timeline-his-rise-fall-russia-call-n720671>

16 Maggie Astor, "Michael Flynn suggested at a QAnon-affiliated event that a coup should happen in the U.S.," *The New York Times*, June 1, 2021, <https://www.nytimes.com/2021/06/01/us/politics/flynn-coup-gohmert-qanon.html>

17 Charlie Savage, "Trump Pardons Michael Flynn, Ending Case His Justice Dept. Sought to Shut Down," *The New York Times*, November 25, 2020, <https://www.nytimes.com/2020/11/25/us/politics/michael-flynn-pardon.html>

18 Anna Bower, "U.S. Government Agrees to \$1.25 Million Settlement in Michael Flynn Suit," *Lawfare*, April 17, 2026, <https://www.lawfaremedia.org/article/u.s.-government-agrees-to--1.25-million-settlement-in-michael-flynn-suit>

19 Josh Gerstein, Matthew Nussbaum and Theodor Meyer, "Flynn pleads guilty to lying to the FBI," *Politico*, December 1, 2017, <https://www.politico.com/story/2017/12/01/muellers-office-announces-flynn-will-plead-guilty-274349>

20 U.S. Department of Justice, "Short Form Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended," U.S. Department of Justice, October 12, 2025, <https://efile.fara.gov/docs/7562-Short-Form-20251012-1.pdf>

Banja Luka.²¹ Flynn's Gold Institute solicited corporate sponsorships for the event, which highlighted Flynn's name as branding in connection with Banja Luka and Republika Srpska.²² As Flynn receives monetary compensation for his lobbying efforts, the RS government and Dodik are strengthening their connections with the Trump administration, and President Trump is making policy decisions that fill Dodik, Flynn, and other RS lobbyists' bank accounts.

ROD BLAGOJEVICH, RUDY GIULIANI, LAURA LOOMER, AND OTHER LOBBYISTS: According to additional FARA filings and reporting, the Republika Srpska government hired former governor of Illinois Rod Blagojevich's firm RRB Strategies LLC to pressure the Trump administration to lift Dodik's sanctions, remove High Representative Christian Schmidt, and build support for RS's secession from Bosnia and Herzegovina in Washington.²³ In support of this lobbying work, Blagojevich, whose 14-year sentence for federal corruption was commuted by President Trump in 2020 and who received a full pardon from President Trump in February 2025, received more than \$700,000.^{24,25} The destabilizing policies for which he was paid to advocate for would, if implemented, undermine decades of U.S. foreign policy and regional security in the Balkans.

Other Trump affiliates who have reportedly been affiliated with the RS government or RS officials include former New York City mayor Rudy Giuliani and right-wing activist Laura Loomer, who have each reportedly lobbied on Dodik's behalf.²⁶ In sum, the Organized Crime and Corruption Reporting Project has detailed RS officials hiring 11 Washington lobbying firms for at least \$8.9 million since President Trump came into office in January 2025 with the aims of destabilizing Bosnia and Herzegovina and furthering Dodik's secessionist goals.²⁷

JOSEPH FLYNN, JESSE BINNALL, AND AAFS INFRASTRUCTURE AND ENERGY LLC: As Michael Flynn, Rod Blagojevich, and others lobbied on behalf of Dodik to remove sanctions, additional Trump-affiliated individuals have sought to profit in Bosnia and Herzegovina's energy sector at the expense of the Bosnian people and the DPA. On November 24, 2025, Joseph Flynn, the brother of the aforementioned Michael Flynn, and Jesse Binnall, a Trump-affiliated lawyer, incorporated AAFS Infrastructure and Energy LLC (AAFS). Within six months, AAFS secured a sole-source contract to implement the Bosnian Southern Interconnection Gas Pipeline despite no prior energy sector or regional experience. The unusual decision by the Federation government to write AAFS into the legislation has raised numerous objections from the EU and outside groups. Part 2 of the report goes into more detail on this process.

Joseph Flynn and Jesse Binnall's resumes do not demonstrate the qualifications necessary to conduct foundational work in Bosnia's energy sector. However, they do indicate close ties to President Trump and his associates. Prior to the founding of AAFS, Joseph Flynn was known for serving as a director at a now-dissolved Florida-based non-profit organization called "Defending the Republic," which involved Trump-affiliated attorney and election denier Sidney

21 Djordje Vujatovic, "Trump Ex-Adviser to Host 'Summit' in Bosnian Serb Entity," *Balkan Insight*, March 31, 2026, <https://balkaninsight.com/2026/03/31/trump-ex-adviser-to-host-summit-in-bosnian-serb-entity/bi/>

22 The Gold Institute for International Strategy, "First Annual Economic & Security Summit Europe -27-28 May 2026," *The Gold Institute for International Strategy*, May 27-28, 2026, <https://www.goldiis.org/first-annual-economic-summit-europe-2026>

24 U.S. Department of Justice, "Supplemental Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended," U.S. Department of Justice, May 12, 2026, <https://efile.fara.gov/docs/7562-Supplemental-Statement-20260512-2.pdf>

25 Gregory Svirnovskiy and Shia Kapos, "Rod Blagojevich has a new gig: Working for the 'Bosnian Bear,'" *Politico*, April 2, 2025, <https://www.politico.com/news/2025/04/02/rod-bлагоjevich-has-a-new-gig-working-for-the-bosnian-bear-00267858>

26 Kenneth P. Vogel, "Sanctions Lifted on a Putin-Backed Autocrat After Lobbying by Trump Allies," *The New York Times*, October 29, 2025, <https://www.nytimes.com/2025/10/29/us/politics/milorad-dodik-sanctions-trump.html>

27 Zdravko Ljubas and Aida Čerkez, "Serb Separatists Paid Millions in Lobbying Campaign that Targeted Diplomat Tasked with Protecting Peace in Bosnia," *OCCRP*, May 15, 2026, <https://www.occrp.org/en/feature/serb-separatists-paid-millions-in-lobbying-campaign-that-targeted-diplomat-tasked-with-protecting-peace-in-bosnia>

Powell and MyPillow CEO Mike Lindell²⁸²⁹ and raised money to challenge the 2020 election results and promote false allegations of mass voter fraud.³⁰

Binnall's connections with President Trump and Michael Flynn can also be traced back to the 2020 election. Following civil cases brought against Trump as a result of the January 6th violent insurrection, Binnall served on President Trump's legal team and his firm, Binnall Law Group, received \$191,075.24 in 2023 for "Legal Consulting" from Trump's Save America PAC (FEC ID: C00762591).³¹ Binnall also served as Michael Flynn's attorney for a separate 2026 settlement with the U.S. government regarding a dispute with the U.S. Army.³²

Jesse Binnall and Joseph Flynn's personal, professional, and financial connections with Trump-affiliated officials and individuals as well as AAFS' lack of regional and sectoral experience raise serious questions about the validity of any AAFS proposal regarding the SIC.

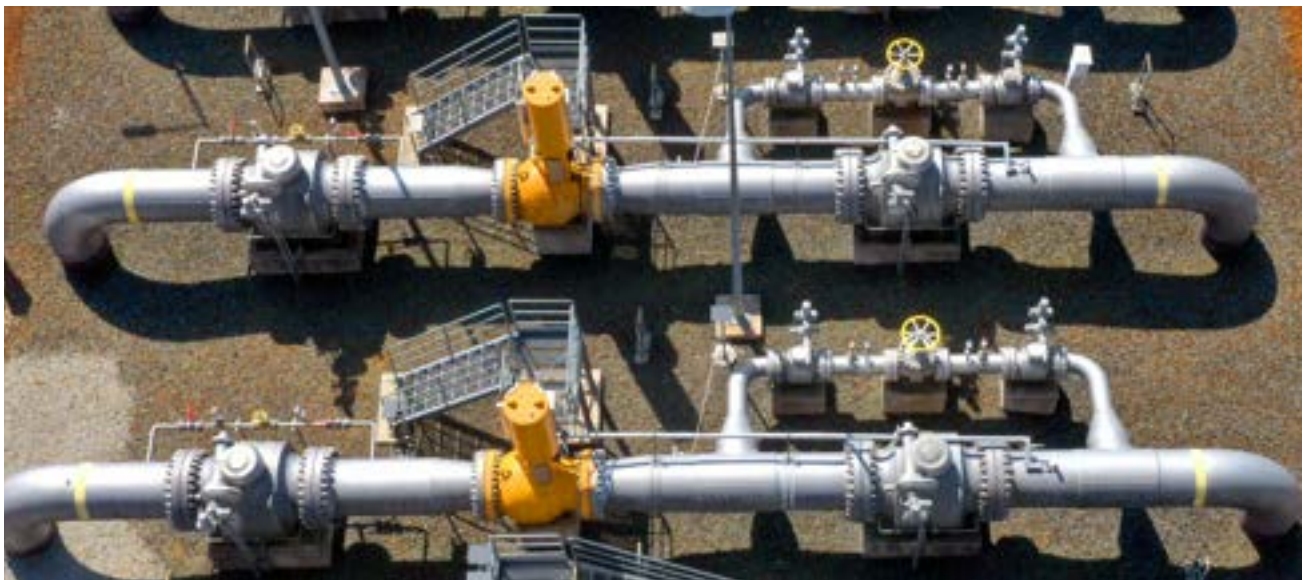
28 Candace Rondeaux, "The Digital General How Trump Ally Michael Flynn Nurtured- and Profited from- the QAnon Conspiracy Theory," *The Intercept*, June 27, 2021, <https://theintercept.com/2021/06/27/qanon-michael-flynn-digital-soldiers/>

29 "Defending the Republic, Inc., Fla. Dep't of State, Div. of Corporations, "Doc. No. N21000002079," Division of Corporations, May 21, 2021, <https://web.archive.org/web/20260306183157/https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEFENDINGREPUBLIC%20N210000020790&aggregateld=domnp-n21000002079-e0a9fee5-81ae-4140-af29-e77c7e066ba5&searchTerm=Defending%20the%20republic&listNameOrder=DEFENDINGREPUBLIC%20N210000020790>

30 Candace Rondeaux, "The Digital General How Trump Ally Michael Flynn Nurtured- and Profited from- the QAnon Conspiracy Theory," *The Intercept*, June 27, 2021, <https://theintercept.com/2021/06/27/qanon-michael-flynn-digital-soldiers/>

31 Save America PAC (FEC ID: C00762591) (2023, January 31, 2024). Schedule B Filings (Itemized Disbursements). Federal Election Commission. Retrieved August 25, 2026, from <https://docquery.fec.gov/cgi-bin/forms/C00762591/1752799/sb/ALL>

32 Zoe Tillman, "Trump Ally Michael Flynn Reached a Second Settlement with DOJ," *Bloomberg Law*, July 7, 2026, <https://news.bloomberglaw.com/us-law-week/trump-ally-michael-flynn-reached-a-second-settlement-with-doj>



WHO IS PROFITING FROM THESE DECISIONS?

Recipient	Payer / Source	Amount	Purpose	Source
A – PAID WITH REPUBLICAN GOVERNMENT FUNDS				
Total Lobbying Efforts	RS GOVERNMENT	\$8.9 MILLION	LOBBYING TO UNDERMINE DAYTON	FOOTNOTE 9
Rod Blagojevich (RRB Strategies LLC)	RS GOVERNMENT	\$700,000	LOBBYING TO UNDERMINE DAYTON	FOOTNOTE 24
Michael Flynn	RS GOVERNMENT	\$100,000/MONTH	LOBBYING TO UNDERMINE DAYTON	FOOTNOTE 20
B – PAID WITH U.S. TAXPAYER FUNDS				
Michael Flynn	U.S. DEPARTMENT OF JUSTICE	\$1,250,000	SETTLEMENT WITH TRUMP ADMINISTRATION	FOOTNOTE 18
C – PAID WITH POLITICAL DONATIONS				
Jesse Binnall (Binnall Law Group)	SAVE AMERICA PAC	\$191,075.24	“LEGAL CONSULTING”	FOOTNOTE 31
D – PROSPECTIVE PRIVATE GAIN				
Joseph Flynn and Jesse Binnall (AAFS Infrastructure & Energy LLC)	SIC CONCESSION; NO NAMED TENDER	ESTIMATED AT \$1.3 BILLION	PIPELINE COST IS ABOUT EQUAL TO \$350 MILLION; THREE ADJACENT POWER PLANTS EQUAL TO ABOUT \$1 BILLION	FOOTNOTE 68

NOTE: “TOTAL LOBBYING EFFORTS” INCLUDES THE \$700,000 AND \$100,000/MONTH FIGURES LISTED BELOW IT.

PART 1: DELISTING OF MILORAD DODIK, HIS FAMILY, AND HIS ALLIES

As detailed above, Milorad Dodik and his RS affiliates spent millions on Trump-connected lobbyists with one overriding goal: persuading a second Trump administration to remove U.S. sanctions. Remarkably, despite Dodik's conviction by the Court of Bosnia and Herzegovina, his removal from office for failing to implement a decision of the High Representative, continuing inflammatory and secessionist rhetoric, and numerous visits to Moscow, in October 2025, Dodik's lobbying campaign to remove U.S. sanctions was successful. Specifically, on October 17th, the Treasury Department's Office of Foreign Assets Control (OFAC) delisted four Dodik affiliates including his Chief of Staff.³³ Twelve days later, on October 29, 2025, OFAC updated its Specially Designated Nationals (SDN) List removing Milorad Dodik, his adult children Igor and Gorica Dodik, and all of Milorad Dodik's affiliates from the list.³⁴

The Trump administration's decision to remove Dodik, his family, and his affiliates from the SDN list drew sharp bipartisan criticism in Congress. On November 12, 2025, as Ranking Member of the House Foreign Affairs Subcommittee on Europe, I wrote, along with Full Committee Ranking Member Gregory Meeks of New York, to Secretary of State Marco Rubio and Secretary of Treasury Scott Bessent in strong opposition to OFAC's decision on Dodik.³⁵ My letter, which can be found in full in Annex 1:

- Condemned Milorad Dodik's destabilizing rhetoric and decisions that undermined the DPA and U.S. interests in the region.
- Expressed support for the Dayton Peace Accords.
- Asked Secretaries Rubio and Bessent about the specific changes in behavior Dodik and his affiliates displayed that warranted the sanctions designation removal.

On December 3, 2025, the State Department provided a previously non-public response, which can be found in full in Annex 2.³⁶ The response, in part, stated:

"When the Trump administration took office, BiH was facing an increasingly destabilizing and unsustainable constitutional and political crisis. The Administration engaged in decisive, discreet diplomacy to de-escalate the situation."

"The outcome advanced U.S. interests in BiH and the Western Balkans. On October 18, the Republika Srpska National Assembly (RSNA) withdrew most of the anti-Dayton legislation it had passed in recent years. Additionally, the RSNA decision to appoint an interim Republika Srpska president affirmed the legal cohesion of the BiH state."

³³ Office of Foreign Assets Control, "Counter Terrorism Designations; Balkans- related Designation Removals," U.S. Department of the Treasury, October 17, 2-25, <https://ofac.treasury.gov/recent-actions/20251017>

³⁴ Office of Foreign Assets Control, "Balkans-related Designation Removals; Issuance of New Russia- related General License and Amended Russia- related Frequently Asked Question," U.S. Department of the Treasury, October 29, 2025, <https://ofac.treasury.gov/recent-actions/20251029>

³⁵ Congressman William R. Keating and Congressman Gregory W. Meeks, "Letter to Secretary Bessent and Secretary Rubio," Congress of the United States, November 12, 2025, https://democrats-foreignaffairs.house.gov/_cache/files/b/9/b9de909a-2ecd-484a-819e-1b5512cf3fc9/5FE97526762140190DFC863C6D470FAF4C3BC8C6C016D1CB2AE1C8FD0B62B1C2.12-nov-2025-keating-meeks-letter-to-state-and-treasury-on-dodik-de-listing-final-98.pdf

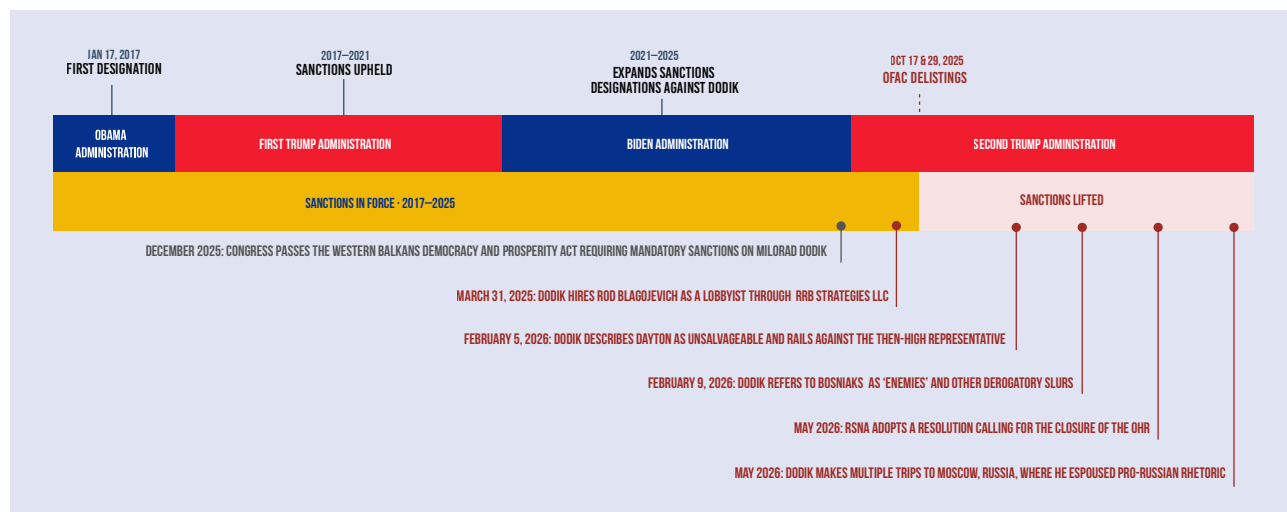
³⁶ The Department of Treasury has not provided a response to the November 2025 letter from Ranking Members Keating and Meeks.

“In response to these positive steps, the United States removed sanctions on RS individuals and entities that had been designated due to their support for the now reversed anti-Dayton legislation passed by the RSNA. Other individuals and entities were removed from sanctions because their original designation was based on their support to, or their actions on behalf of, Dodik as a sanctioned and “blocked person.”

“We are hopeful that for the first time in many years, BiH is not facing a constitutional or political crisis. The U.S. government opened a path for BiH leaders to engage constructively to pursue a more stable future for their country, one in which local actors drive local solutions. The United States will continue to work with all parties in BiH and use all the tools at its disposal to promote stability, security, and mutual prosperity.”

I agree with the State Department that immediately prior to the delistings, Dodik and his associates took steps that the High Representative for Bosnia and Herzegovina noted “marked a formal rollback of the Republika Srpska’s unilateral institutional decoupling from the rest of the country.”³⁷ However, it is my belief based on conversations with administration and regional officials that the removal of sanctions on Milorad Dodik was predicated on more than just the short-term compliance of Dodik, his SNSD party, and other affiliates with the DPA, the decisions of the High Representative, and the decisions of the Bosnian Constitutional Court. Instead, I believe the Trump administration’s decisions to remove the sanctions on Dodik were predicated on the informal and faulty U.S. government assumption that Dodik and his affiliates would be productive partners in the long-term implementation of the DPA. Dodik has clearly failed to live up to his end of the bargain.

TIMELINE OF IMPLEMENTATION AND REMOVAL OF SANCTIONS ON MILORAD DODIK



³⁷ Office of the High Representative, “69th Report of the High Representative for the Implementation of the Peace Agreement on Bosnia and Herzegovina to the Secretary-General of the UN,” Office of the High Representative, May 12, 2026, <https://www.ohr.int/69th-report-of-the-high-representative-for-implementation-of-the-peace-agreement-on-bosnia-and-herzegovina-to-the-secretary-general-of-the-un/>

The subsequent examples of Dodik's behavior following the administration's misguided decision to remove sanctions are not exhaustive but represent prominent reasons for why the sanctions should be reimposed:

- First, on February 5, 2026, Dodik, member of the Presidency of Bosnia and Herzegovina Zeljka Cvijanovic, and other RS officials visited Washington, D.C. to attend the National Prayer Breakfast and meet with senior members of the Trump administration. During the visit, Dodik gave an interview to the Financial Times in which he repeatedly called for the independence of Republika Srpska, exactly the rhetoric the delistings were intended to halt.³⁸ In the interview, he “described the Dayton Peace Accords as unsalvageable and railed against then-High Representative Christian Schmidt” who he claimed had “no legitimacy” in Bosnia and Herzegovina.³⁹
- Second, on February 9, 2026, in a speech celebrating his ally Sinisa Karan's victory in the RS presidential repeat election, Dodik referred to the Bosniaks, the predominantly Muslim constituent people of Bosnia and Herzegovina (alongside Bosnian Croats and Bosnian Serbs), as ‘enemies’ and other derogatory slurs.⁴⁰ This racist and Islamophobic rhetoric, which echoes Dodik's past statements when he referred to Bosniaks as ‘Turks’ and called their actions a form of ‘primitivism,’ represents a pattern for the SNSD leader. In May 2026, then-High Representative Christian Schmidt called Dodik out for “consistently [using] rhetoric targeting Bosniaks, which aligns with his broader political strategy of delegitimizing both Bosniaks as a Constituent People and pro-Bosnia and Herzegovina political positions.”⁴¹ I agree with Schmidt's assessment that Dodik's rhetoric is not only destabilizing in Bosnia, but also undermines Bosnia's multi-ethnic character, which is reaffirmed by the DPA. The Trump administration's delisting of Dodik should have resulted in a cessation of this racist behavior.
- Third, in May 2026, the RSNA, which is de facto controlled by Dodik and his allies, adopted a “Declaration on the Closure of the Office of the High Representative” calling for the position of High Representative to be terminated and the OHR as a whole to be shut down.⁴² This political move contradicts the previously agreed upon conditions (the “5+2 objectives”) required to be met by BiH authorities prior to the closure of the OHR,⁴³ further undermining the DPA and contributing to political instability.
- Finally, adjacent to the decision to remove U.S. sanctions on Dodik and his allies, Dodik has made numerous visits to Moscow prior to and since the October 2025 decision to delist him that should raise concerns within the Trump administration. In May 2026, Dodik visited Moscow twice, first on the occasion of Russian Victory Day and second with RS Minister of Internal Affairs Zeljko Budimir where he attended an international security forum and used his speech to the plenary session to say that “the Serb people know that good will prevail over evil with Russian power and resolve, and that the world order will be based on stable foundations of multi-polarity, the central pillar of

38 Amy Mackinnon and Marton Dunai, “The Bosnian Serb with ‘high expectations’ of Trump,” *Financial Times*, February 10, 2026, <https://www.ft.com/content/0550bde8-462b-4b62-9e62-05354556840d>

39 Amy Mackinnon and Marton Dunai, “The Bosnian Serb with ‘high expectations’ of Trump,” *Financial Times*, February 10, 2026, <https://www.ft.com/content/0550bde8-462b-4b62-9e62-05354556840d>

40 Azra Husaric Omerovica, “Bosnian Serb Leader Accused of Racist Rhetoric in Election Victory Speech,” *Balkan Insight*, February 10, 2026, <https://balkaninsight.com/2026/02/10/bosnian-serb-leader-accused-of-racist-rhetoric-in-election-victory-speech/bi/>

41 Office of the High Representative, “69th Report of the High Representative for the Implementation of the Peace Agreement on Bosnia and Herzegovina to the Secretary-General of the UN,” *Office of the High Representative*, May 12, 2026, <https://www.ohr.int/69th-report-of-the-high-representative-for-implementation-of-the-peace-agreement-on-bosnia-and-herzegovina-to-the-secretary-general-of-the-un/>

42 SRNA, “Declaration Calling for OHR Closure Passed,” *Srpska National*, May 26, 2026, <https://www.srna.rs/en/novost/1399993/declaration-calling-for-ohr-closure-passed>

43 Office of the High Representative, “Agenda 5+2,” *Office of the High Representative*, <https://www.ohr.int/agenda-52/>

which is Russia.”⁴⁴ ⁴⁵ This pro-Russian rhetoric is not exemplary of a U.S. partner and demonstrates the misguided nature of the Trump administration’s decision to remove the sanctions on Milorad Dodik.

From his February 2026 visit to Washington where he openly defied Dayton’s legitimacy to his Islamophobic rhetoric towards Bosniaks and his ongoing demands for the closure of the OHR, Dodik has made clear that the administration’s belief that, as stated in its response to my November 2025 letter, “for the first time in many years, BiH is not facing a constitutional or political crisis” is not only misguided, but ill-informed.

While Dodik continues to undermine the “positive steps” he took which led the United States to remove sanctions on RS individuals and entities, as outlined in the Annex 2, Bosnian and international officials are questioning the legality and transparency of the methods by which he achieved this — through shady lobbying deals with Trump affiliates. In March 2026, Republika Srpska Vice President Camil Durakovic filed a criminal complaint with the Banja Luka District Public Prosecutor’s Office asking it to investigate the suspected unlawful disposal of RS budget funds in connection with Blagojevich’s RRB Strategies LLC.⁴⁶ A month later, the Deputy Speaker of the Bosnia and Herzegovina House of Representatives filed a motion before the Constitutional Court over what he claimed were the unconstitutional and illegal allocation of budget funds from RS for lobbying on issues that undermined the state of Bosnia and Herzegovina.⁴⁷ Although the legality of RS’s lobbying contracts with Blagojevich and others remains with various government entities in RS and Bosnia and Herzegovina to resolve, it is clear that Milorad Dodik and his allies have used public funds to pay influential individuals linked to the administration to lobby on behalf of interests and goals that undermine decades of U.S. policy in Bosnia and Herzegovina.

While Congressional and international officials question the legitimacy of the decision to delist Dodik, the Trump administration’s trust and partnership with Milorad Dodik has enabled corrupt actors like Michael Flynn and Rod Blagojevich to profit from the policy decisions of the administration. People like Michael Flynn can now use Dodik’s delisting to tout the supposed strength of the RS economy and use his own Gold Institute to profit off the backs of the people of Bosnia and Herzegovina. This pay-for-play scheme is as unacceptable as it is standard for this administration. As outlined in Part 2 of this report, the Trump administration’s corruption in Bosnia continues through the provision of the SIC contract.

⁴⁴ SRNA, “Two Visits in One Month: Dodik and Republika Srpska Delegation Return to Moscow,” *Sarajevo Times*, May 28, 2026, <https://sarajevotimes.com/two-visits-in-one-month-dodik-and-republika-srpska-delegation-return-to-moscow/>

⁴⁵ Beta, “Dodik in Moscow: Serb Politics Orienting by Looking What Moscow Does,” *Briefing*, May 28, 2026, <https://beta-briefing.com/news/politics/35111-dodik-in-moscow-serb-politics-orienting-by-looking-what-moscow-does>

⁴⁶ FENA, “Republika Srpska Vice President files criminal complaint over entity lobbying contract in the US,” *N1*, March 16, 2026, <https://n1info.ba/english/news/republika-srpska-vice-president-files-criminal-complaint-over-entity-lobbying-contract-in-the-us/>

⁴⁷ N1 Sarajevo, “Bosnian lawmaker files motion, demands that funding for Republika Srpska lobbying abroad stops,” *N1*, April 13, 2026, <https://n1info.ba/english/news/bosnian-lawmaker-files-motion-demands-that-funding-for-republika-srpska-lobbying-abroad-stops/>

PART 2: SOUTHERN INTERCONNECTION GAS PIPELINE

President Trump's first corrupt decision in Bosnia and Herzegovina, to remove sanctions on Milorad Dodik, upended decades of U.S. policy and led to the appearance of the administration siding with secessionist RS officials in their years-long crusade against the Dayton Peace Agreement and related institutions. President Trump's second decision — to facilitate the contract for building, operating, and maintaining the SIC to a Trump-affiliated company — has created additional opportunities for the administration to reward its friends and allies.

The Trump administration's use of the SIC for corrupt ends is particularly damaging as it erodes a long-term bipartisan U.S. objective in seeing through the successful completion and operation of this project. The SIC is intended to link Bosnia with Croatia's gas network and the LNG terminal at Krk island, representing an important opportunity to integrate Bosnia's energy markets with the European Union, align Bosnia and Herzegovina with the EU's plans to fully phase out Russian gas by the end of 2027, and serve as an additional market for U.S. LNG.⁴⁸

Unfortunately, rather than continue with decades of bipartisan support for Bosnia and Herzegovina's energy security through the successful development of the SIC, the Trump administration has used its diplomatic influence and connections with shady characters like Michael Flynn, Rod Blagojevich, and Rudy Giuliani to facilitate the concession contract for the SIC to AAFS Infrastructure and Energy LLC, a company owned and operated by Michael Flynn's brother Joseph Flynn and Trump-affiliated lawyer and political activist Jesse Binnall.

THE TIMELINE REGARDING THE ESTABLISHMENT OF AAFS IS MOST CONCERNING:

- On **November 9, 2025**, at the Partnership for Transatlantic Energy Cooperation (P-TEC) conference in Greece, senior U.S. energy officials met with senior Bosnian officials regarding the further diversification of energy supply sources in the region.⁴⁹
- On **November 20, 2025**, officials from the U.S. Embassy in Sarajevo met with senior FBiH officials regarding the potential for an American company to “develop, build, and manage the pipeline.”⁵⁰
- **On November 24, 2025, just four days later, Joseph Flynn and Jesse Binnall established AAFS as a company in the United States.**⁵¹

48 Predrag Zvijerac and Gjeraqina Tuhina, “EU Warns Bosnia US Gas Project Could Threaten 1 Billion Euros In Aid,” *RadioFreeEurope RadioLiberty*, April 25, 2026, <https://www.rferl.org/a/eu-bosnia-gas-pipeline-us-investor-aid/33741747.html>

49 Federal Ministry of Energy, Mining and Industry, “Lakić: Izgradnja Južne interkonekcije ključ energetske nezavisnosti FBiH,” Federal Ministry of Energy, Mining and Industry, November 9, 2025, <https://fmeri.gov.ba/vijesti/posts/2025/november/lakic-izgradnja-juzne-interkonekcije-kljuc-energetske-nezavisnosti-fbih/>

50 US Embassy Sarajevo (@USEmbassySJJ), “Chargé d’Affaires, a.i. John Ginkel met with the five leaders of the governing coalition in the Federation of Bosnia and Herzegovina today ...,” X, November 20, 2025 <https://x.com/USEmbassySJJ/status/1991536697801089449>

51 AAFS Infrastructure and Energy L.L.C., “Wyoming Secretary of State, November 24, 2025, <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=022215174024087053093061222056116201134168091002>.

- By **April 2026**, and following numerous meetings between Trump administration officials, representatives of AAFS, and officials from the Bosnian government, as well as a visit by Donald Trump Jr. at the invitation of Igor Dodik focused on increasing investment in RS, AAFS had been directly named in FBiH legislation as the project investor for the SIC, creating a non-competitive and lucrative business opportunity for the company despite its lack of experience in the region.^{52 53}

In a vacuum, AAFS's establishment does not raise alarm bells. However, as is typical of the Trump administration, I believe Joseph Flynn and Binnall recognized that, if they acted fast, they could use their connections with the Trump administration to financially benefit from the SIC.

In April 2026, I wrote a private letter, shown in Annex 3, to Secretary of State Rubio expressing my concern about the potential awarding of the contract for the SIC to AAFS, an inexperienced firm with close personal and political ties to the Trump administration. In response to my April 2026 letter to Secretary Rubio on the SIC and AAFS's role, the State Department provided a thorough but unsatisfactory response outlined in Annex 4 of this report.

I appreciate the Department's robust response to my inquiry. However, the Department's written response contradicts the Trump administration's policy decisions, which advocated for AAFS to be the sole concessionaire for the project and further undermines the implementation of the DPA. Moreover, while the U.S. Embassy in Sarajevo may be legitimately advocating for a U.S. company, political officials at the Department and throughout the administration have viewed the SIC as a means to further enrich administration allies with billions in contracts. I have come to this conclusion for the following reasons.

- First, AAFS has zero regional or energy sector experience that could help it operate the concession contract for the SIC. At the time of writing, AAFS's website lists no involvement in previous infrastructure or energy projects.⁵⁴ It is therefore difficult to understand why, without significant U.S. government pressure, the Federation of Bosnia and Herzegovina (FBiH) parliament would choose to write AAFS into the legislation that establishes the SIC. If AAFS proves to be unable to complete the project, no other company is legislatively designated as the holder of the investment, a costly gamble that rewards President Trump's political allies Joseph Flynn and Jesse Binnall at the potential expense of the Bosnian people. This contractual structure could also enable AAFS to profit from the contract while providing no substantive value to the pipeline's completion.
- Second, U.S. officials put in significant diplomatic effort lobbying on behalf of AAFS, potentially risking future bilateral trust on our broader strategic goals. The U.S. Embassy in Sarajevo was heavily involved in the technical discussions of amendments to the SIC law that ultimately named AAFS as the concessionaire, participating in January and February 2026 technical working group meetings and other legislative discussions with representatives of the five-party FBiH governing coalition.^{55 56} At the same time, U.S. officials in Croatia lobbied on behalf of AAFS to work towards its receipt of the SIC contract, with U.S. Ambassador Nicole McGraw releasing several statements of sup-

52 Reuters, "Donald Trump Jr calls EU 'a bit of a mess' on visit to Bosnia's Republika Srpska," *The Guardian*, April 7, 2026, <https://www.theguardian.com/us-news/2026/apr/07/donald-trump-jr-eu-visit-bosnia-republika-srpska>

53 SRNA, "Igor Dodik on key steps with the US: No more imposition or cowboy politics by Murphy and Schmidt," *SRpska NAtional*, August 24, 2026, <https://www.srna.rs/en/novost/1423299/igor-dodik-on-key-steps-with-the-us-no-more-imposition-or-cowboy-politics-by-murphy-and-schmidt>

54 AAFS Infrastructure & Energy, AAFS, Archived July 19, 2026, at <https://web.archive.org/web/20260719134602/https://www.aafsenergy.com/>

55 US Embassy Sarajevo (@USEmbassySJJ), "U.S Embassy Representatives joined the Southern Interconnection Technical Working Group ...," X, January 15, 2026, <https://x.com/USEmbassySJJ/status/2011804450185183702>

56 US Embassy Sarajevo (@USEmbassySJJ), "Work on the Southern Interconnection pipeline is moving forward...," February 6, 2026, <https://x.com/USEmbassySJJ/status/2019795077732737268>

port for the project.^{57 58} While every U.S. embassy should advocate on behalf of American companies, the embassy's reported level of involvement in the technical and contractual aspects of this project – which involves promoting an unproven company with personal, professional, and financial ties to Trump affiliates for a sole-source concession – demonstrates the Trump administration's lack of care regarding the U.S.-Bosnia bilateral relationship and the administration's lack of interest in the long-term viability of the SIC.

- Third, the sole-source nature of the legislation that awards the concession contract for the SIC to AAFS could undermine Bosnia and Herzegovina's EU accession process, a key U.S. priority for Bosnia. For years, Bosnia and Herzegovina has sought to move closer to the European Union, including in energy security. The EU requires an open and transparent procurement process to ensure public contracts are awarded fairly and efficiently across the EU's single market.⁵⁹ While Bosnia and Herzegovina is not yet an EU member state, as a candidate country it is expected to align its legislation and standards with those of the EU. EU officials reportedly made clear to Bosnian officials that coordination with the EU on the SIC was critical for Bosnia to “avoid missing out on opportunities for further integration, as well as financial opportunities.”⁶⁰ As such, the single-source nature of the SIC concession contract, as facilitated by the U.S. Embassy in Sarajevo, rewards President Trump's allies while undermining Bosnia and Herzegovina's EU accession prospects. While the western integration of Bosnia and Herzegovina's energy sector is a key U.S. and EU priority, I believe it should not come at the expense of Bosnia and Herzegovina's future membership in the European Union. The Trump administration's disregard for Bosnia and Herzegovina's EU accession — and partnership with local actors opposed to European integration — is part and parcel of a broader hostile Trump administration approach to the EU that sees the bloc as a geopolitical foe as opposed to a longstanding partner with common interests.

57 U.S. Embassy in Zagreb, “Ambassador McGraw's Remarks At The Jutarnji List Energy Conference,” U.S. Embassy in Croatia, January 27, 2026, <https://hr.usembassy.gov/ambassador-mcgraws-remarks-at-the-jutarnji-list-energy-conference/>

58 Ambassador Nicole McGraw (@USAmbCroatia), “I welcome the progress in Sarajevo today...,” X, December 23, 2025, <https://x.com/USAmbCroatia/status/2003453114318307409>

59 “Fact Sheets on the European Union”, 2026, https://www.europarl.europa.eu/erpl-app-public/factsheets/pdf/en/FTU_2.1.10.pdf

60 Tom Burgis, “EU risks fallout with US over Trump-linked Balkans pipeline plan,” April 23, 2026, <https://www.theguardian.com/world/2026/apr/23/eu-risks-fallout-with-us-trump-linked-balkans-pipeline-plan-intervention>

PART 3: IMPACT OF THE STATE PROPERTY ISSUE ON THE SOUTHERN INTERCONNECTION AND THE DAYTON PEACE ACCORDS

The Trump administration's delisting of Dodik and ill-advised advocacy on the SIC has impacts well beyond directly undermining U.S. interests in the Western Balkans. Specifically, Trump's decisions in Bosnia create further domestic political imbalances between Bosnian entity and state level governments that run contrary to the Dayton Peace Accords and harm the long-term interests of the Bosnian people.

As the SIC moves towards contracting, the project now faces the complex legal and political challenge of resolving the disputed public land ownership ("state property issue") over which the pipeline must pass. In recent years, Republika Srpska has unilaterally tried to claim ownership of state properties located in RS including by passing entity legislation that was subsequently struck down by the Constitutional Court.⁶¹ Resolving the issue of state property is a longstanding challenge and a state-level resolution is a key condition among several longstanding prerequisites (the "5+2 objectives") for the closure of the Office of the High Representative and a self-sustaining Bosnia. However, the Trump administration's approach to Bosnia via Dodik's delisting and the SIC have resulted in an unstable geopolitical environment that, for the following reasons, call into question the Trump administration's stated commitment to stability in Bosnia and upholding the DPA.⁶²

First, resolving state property is an important priority for Bosnia and the United States. Yet, resolving the issue hastily and in a way that undermines the Bosnia and Herzegovina state government will only weaken Bosnia's central governing authority. Furthermore, it would create opportunities for greater corruption in Bosnia and Herzegovina and potentially inflame tensions between ethnic groups in the country.⁶³

Second, Trump's emboldening of Milorad Dodik creates further challenges for resolving state property. Under the Obama, first Trump, and Biden administrations, U.S. sanctions on Dodik demonstrated the U.S. government's willingness to hold him accountable for his actions that undermine Dayton. Now, by rewarding Dodik and his lobbyists through the removal of sanctions and the Trump administration's pro-Serb tilt, the administration lacks the necessary leverage over Dodik to prevent destabilizing actions that make resolving the state property issue more challenging.

Third, the Trump administration's weakening of the OHR and its sparring with European partners about a successor to Christian Schmidt has eroded the legitimacy of the official tasked with reining in bad actors who undermine Dayton, a key Dodik priority.

Finally, the Flynn brothers' dubious connections with Dodik and the SIC create a clear conflict of interest, with

61 Azem Kurtic, "Bosnian Serb Leader Vows to Defy International Envoy Over Property Law," *Balkan Insight*, February 28, 2023, <https://balkaninsight.com/2023/02/28/bosnian-serb-leader-vows-to-defy-international-envoy-over-property-law/bi/>

62 John Kelley, "Remarks at a UN Security Council debate on Bosnia and Herzegovina," *United States Mission to the United Nations*, May 6, 2026, <https://usun.usmission.gov/remarks-at-a-un-security-council-debate-on-bosnia-and-herzegovina-4/>

63 Kurt Bassuener, et. Al, "Peace Dividend? What the Discussion about State Property in Bosnia and Herzegovina Really Means," *Democratization Policy Council*, July 24, 2023, <https://www.democratizationpolicy.org/peace-dividendwhat-the-discussion-about-state-property-in-bosnia-and-herzegovina-really-means/>

both Flynn brothers incentivized to use their close connections to the U.S. administration to further erode the institutions of Dayton for their own personal profit. Since the SIC's success largely depends on a resolution of the issue of state property, both Flynn brothers, Blagojevich, and other lobbyists all stand to profit should state property be resolved in a manner that strengthens Dodik's constitutional position and undermines the state-level government of Bosnia and Herzegovina. This creates malign incentives for all involved at the expense of the Bosnian people and long-term U.S. interests.



CONCLUSIONS

The Trump administration's policies towards Bosnia and Herzegovina depart from longstanding, bipartisan U.S. strategic objectives in the Western Balkans, namely maintaining the credibility of U.S. commitments, preventing renewed ethnic confrontation, supporting Euro-Atlantic integration, and limiting historically adversarial Russian malign influence. For three decades, successive Republican and Democratic administrations have enforced the principle that leaders who attempt to undermine Bosnia and Herzegovina's constitutional order should incur meaningful political and economic costs to deter future challenges to the Dayton framework by any political actor. By showing more accommodation toward the RS and greater skepticism toward the OHR, the United States has put into question its long-term commitment to Bosnia's existing constitutional framework. These actions have been inherently destabilizing given that Bosnia and Herzegovina's political system is built in part on the requirement that internal and external actors must uphold the principles of the DPA even when ethnic or societal divisions get in the way.

CONCLUSIONS ON DODIK SANCTIONS

Given the clear contradictions between the administration's public actions regarding Milorad Dodik and the State Department's response to my letter, I have concluded that the administration's decision to remove sanctions on Milorad Dodik was misguided, corrupt, and done with the purpose of supporting Trump-affiliated lobbyists Michael Flynn, Rod Blagojevich, and others. Dodik's conduct since October 2025 demonstrates he has failed to comply with the terms of what I believe to be an informal conditions-based understanding, implied to an extent in Annex 2, where Dodik would comply with the terms of the Dayton Accords and cease his inflammatory and secessionist activity in exchange for sanctions relief from the Trump administration. In March 2025, months prior to the delisting, Secretary Rubio himself called out Dodik's behavior as "dangerous and destabilizing."⁶⁴ Despite the RSNA and Dodik's decision to withdraw harmful legislation which the administration cites in their response to my November 2025 letter, the conduct Secretary Rubio condemned in March 2025 continues.

Congress has recognized Dodik's ongoing destabilizing conduct and passed the Western Balkans Democracy and Prosperity Act — legislation I led in the House alongside Senator Jeanne Shaheen in the Senate and was included in the Fiscal Year 2026 National Defense Authorization Act — requiring the Trump administration to impose sanctions, within 90 days, on individuals who undermine the DPA.^{65 66 67} Dodik's actions clearly match the activity outlined in Section 8335(b), which warrants the reimposition of U.S. sanctions on Dodik, and the recommendations in this report provide avenues for further accountability for Milorad Dodik and the Trump administration.

Despite no meaningful change in behavior from Dodik, Michael Flynn, Rod Blagojevich, and other Trump loyalists

⁶⁴ U.S. Embassy in Belgrade, "Secretary Marco Rubio on the Actions of Republika Srpska President Milorad Dodik," U.S. Embassy in Serbia, March 8, 2025, <https://rs.usembassy.gov/secretary-marco-rubio-on-the-actions-of-republika-srpska-president-milorad-dodik/>

⁶⁵ Foreign Relations Committee, "Senators Shaheen, Grassley, Wicker, Durbin, Tillis, Warren, Representatives Turner and Wagner Press Administration to Impose Sanctions on Milorad Dodik," Foreign Relations Committee, March 27, 2026, <https://www.foreign.senate.gov/press/dem/release/senatorsshahen-grassley-wicker-durbin-tillis-warren-representatives-turnerand-wagnerpress-administration-to-impose-sanctions-on-milorad-dodik>

⁶⁶ U.S. Congress, "H.R.5274- Western Balkans Democracy and Prosperity Act," Congress.Gov, September 10, 2025, <https://www.congress.gov/bill/119th-congress/house-bill/5274/text>

⁶⁷ Section 8335 the National Defense Authorization Act for Fiscal Year 2026 (Public Law 119-60)

have made millions off the Trump administration's decision to remove the sanctions on him. The administration could have chosen to issue general licenses or exemptions or design a gradual, tiered approach to sanctions removal that would have facilitated Dodik's long-term compliance with the key tenets of Dayton. Instead, the administration's removal of all sanctions on Dodik and his affiliates eliminated the totality of the Trump administration's leverage over him while simultaneously rewarding the President's friends. Unfortunately, the removal of sanctions on Dodik was only the first in a series of policy decisions in Bosnia and Herzegovina that has undermined U.S. long-term interests in the country and rewarded the President's allies.

CONCLUSIONS ON THE SOUTHERN INTERCONNECTION GAS PIPELINE

Through my engagement with regional officials, U.S. officials, and civil society, I have concluded that the Trump administration is using the SIC as a vehicle to enrich its friends and allies. I have come to this conclusion because, when combined with the Trump administration's previous sanctions removals on Milorad Dodik, his family, and his affiliated entities, the administration's actions create a clear pattern of behavior in Bosnia that favors RS officials' preferred outcomes, undermines the DPA, and rewards the administration's allies with monetary gains. For example, the State Department's response to my April 2026 letter is devoid of any mention of Jesse Binnall and Joseph Flynn's close connections with the administration. Yet, my April 2026 letter outlines the millions of dollars Trump-linked lobbyists like Rod Blagojevich and Michael Flynn are receiving for their efforts to remove sanctions on Milorad Dodik. Joseph Flynn's familial connections to Michael Flynn and his years-long defense of the President's false claims of election fraud in the 2020 presidential election are now being rewarded by the administration in the form of a billion-dollar concession for a gas pipeline that he and his affiliate Jesse Binnall, who have no regional or sectoral experience, lack the ability to build.⁶⁸ As Transparency International noted, the FBIH-approved legislation sets a "dangerous precedent that raises justified suspicion that this is a so-called *tailor-made* legal solution."⁶⁹ I agree, and as the European Union noted, the structure of the deal could inhibit Bosnia and Herzegovina's ability to join the EU Single Market.⁷⁰

Therefore, I believe, given the extensive public evidence, the clear contradictions between the administration's written policy statements and its public actions, and AAFS's lack of sectoral or regional experience, the support provided by the Trump administration to AAFS and the SIC is corrupt and devoid of any consideration of the long-term success of the project, the DPA, Bosnia and Herzegovina's EU accession process, or the people of Bosnia and Herzegovina.

CONCLUSIONS ON STATE PROPERTY, REPUBLIKA SRPSKA, AND DAYTON PEACE ACCORDS

Given that the resolution of state property is a key criterion for closing the OHR – a key Dodik priority – and the overall success of the SIC, I believe the Trump administration will use the SIC, an emboldened Dodik, a weakened OHR, and personal connections with the Flynn brothers to pressure the Bosnian state-level policymakers to resolve the state property issue in a manner that favors the RS government at the entity level at the expense of the central government in Bosnia and Herzegovina. I believe the administration might specifically pressure the Bosniak member of the Presidency to resolve the state property issue in a manner that favors entity-level ownership over state ownership, aligns with RS's longstanding constitutional position, weakens Bosnia's central institutions, and facilitates the further construction of the SIC.

68 Tom Burgis, "Why \$1bn in Balkans energy contracts are going to an obscure company connected to Donald Trump," *The Guardian*, May 30, 2026, <https://www.theguardian.com/world/2026/may/30/why-1bn-in-balkans-energy-contracts-are-going-to-an-obscure-company-connected-to-donald-trump>

69 Transparency International Bosna i Hercegovina, "TI BiH warns: Appointment of Investor Through Amendments to the Southern Interconnection Law sets a Dangerous Precedent," *Transparency International Bosna i Hercegovina*, March 30, 2026, <https://ti-bih.org/ti-bih-warns-appointment-of-investor-through-amendments-to-the-southern-interconnection-law-sets-a-dangerous-precedent/?lang=en>

70 Predrag Zvijerac and Gjerqina Tuhina, "EU Warns Bosnia US Gas Project Could Threaten 1 Billion Euros In Aid," *RadioFreeEurope RadioLiberty*, April 25, 2026, <https://www.rferl.org/a/eu-bosnia-gas-pipeline-us-investor-aid/33741747.html>

HOUSE FOREIGN AFFAIRS COMMITTEE MINORITY, SUBCOMMITTEE ON EUROPE

I have no doubt that if the Trump administration is successful in this effort, Milorad Dodik, Michael Flynn, Rod Blagojevich, Joseph Flynn, Jesse Binnall, and AAFS will politically and financially benefit. Meanwhile, the people of Bosnia who depend on Bosnia and Herzegovina remaining a sovereign, multi-ethnic state will see the peace established by Dayton that has facilitated economic growth over the past three decades further undermined and threatened.

The Trump administration's corrupt policies leave the United States with the choice of surrendering to secessionists in Bosnia and Herzegovina who reject the DPA or staying involved for the long run with little progress toward achieving the DPA's goals. The Trump administration has chosen the former and enriched its friends in the process.

RECOMMENDATIONS

The following recommendations provide options for Congress, the Trump administration, and others to reaffirm support for the people of Bosnia and Herzegovina, the DPA, and the constitutional integrity of Bosnia. At the same time, these recommendations provide avenues for those actors to push back on destabilizing influence from Moscow and Beijing, which the Trump administration's policies have enabled.

Trump Administration:

- President Trump must reimpose sanctions on Milorad Dodik, his family, and his affiliates for undermining the Dayton Peace Accords. The Bipartisan Western Balkans Democracy and Prosperity Act, which passed into law as part of the Fiscal Year 2026 National Defense Authorization Act, mandates the reimposition of sanctions on Dodik for his corrupt and destabilizing rhetoric. President Trump must follow the law and impose these sanctions to increase the costs on Dodik for his actions.
- Secretary Rubio, Deputy Secretary Landau, Counselor Needham, Assistant Secretary Hanrahan, relevant Senior Bureau Officials, relevant Deputy Assistant Secretaries, U.S. Embassy officials in Bosnia and Herzegovina, and others must preserve all communications regarding the delisting of Milorad Dodik and the SIC.
- The State Department should consider pausing its diplomatic advocacy for AAFS and work with state- and entity-level authorities in Bosnia to find an American company capable of building, operating, and maintaining the SIC pipeline. AAFS's lack of experience in the region or the energy sector raises concern regarding its ability to fulfill potential contractual obligations. Continued U.S. government advocacy for a AAFS erodes trust in long-term US commercial diplomacy efforts and damages the reputation of the United States.
- The Trump administration must work with Europe, not against it, in reaffirming the Dayton Peace Accords to preserve regional stability and engage in productive dialogues with all parties to push towards a resolution of the state property issue that preserves Bosnia and Herzegovina's sovereignty and territorial integrity.
- Given Christian Schmidt's 2026 resignation and the still unfilled position of the High Representative, the Trump administration should quickly engage with allies and partners on the Peace Implementation Council to choose a new High Representative who will defend the DPA and uphold Bosnia's territorial integrity and multi-ethnic character as well as facilitate broader reforms in line with Bosnia's EU and NATO aspirations.
- The Trump administration must further Bosnia and Herzegovina's accession process to the European Union. While the Trump State Department is focused on "empowering local actors to resolve their own challenges, rather than perpetuating an overreliance on international intervention or supervision," I believe the path for empowering local actors in Bosnia is best achieved through European integration. Increased foreign assistance programming in Bosnia and Herzegovina focused on rule of law, anti-corruption, and public procurement reform, as well as reaffirmed U.S. support for NATO's role in providing a security backup for the EUFOR mission, are critical aspects of a pro-European Bosnia and Herzegovina that ultimately furthers U.S. interests in the Western Balkans.

Congress:

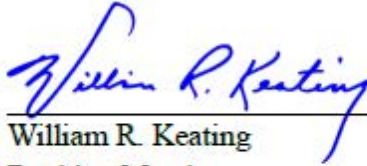
- House and Senate Republicans, who control the majority in both chambers and hold subpoena power, must compel the testimony of administration officials regarding the administration's policies towards Bosnia and Herzegovina, the removal of Dodik sanctions, the facilitation of the SIC pipeline contract, and the present-day implementation of the Dayton Peace Accords.
- House and Senate Republicans must investigate AAFS Infrastructure and Energy LLC for its corrupt practices in Bosnia and Herzegovina and its suspicious connections with the Trump administration as well as demand greater clarity regarding the sources of funding which AAFS aims to solicit to carry out the project.
- House and Senate Republicans must use their subpoena power to compel all communications from Secretary Rubio, Deputy Secretary Landau, Counselor Needham, Assistant Secretary Hanrahan, relevant Senior Bureau Officials, relevant Deputy Assistant Secretaries, U.S. Embassy officials in Bosnia and Herzegovina, and others regarding the delisting of Milorad Dodik and the SIC.
- House and Senate Republicans must compel testimony from Michael Flynn, Rod Blagojevich, and other lobbyists working on behalf of Dodik regarding their connections with administration officials and their lobbying efforts to facilitate Dodik's delisting.

European Union:

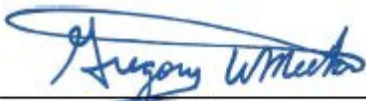
- The European Union should take a more assertive role in policy in Bosnia and Herzegovina by coordinating member-state positions more effectively to reduce policy divergence.
- The European Commission should develop an EU-wide sanctions regime against Dodik, his enablers, and others destabilizing Bosnia and Herzegovina and the region following the lead of EU member states that have imposed restrictive measures.
- The European Union should engage productively with the OHR to facilitate broader reforms to further Bosnia and Herzegovina's EU and NATO aspirations in line with the OHR's mandate and work towards facilitating the previously established objectives of the 5+2 agenda.
- The European Union should conclude accession negotiations with qualified candidate countries, particularly Montenegro, to demonstrate reform is rewarded and strengthen the EU's leverage throughout the Western Balkans.
- The European Union should prioritize energy integration and connectivity projects that reduce Bosnia and Herzegovina's strategic vulnerabilities and deepen its integration with European energy markets.

Civil Society:

- Civil society should continue investigating connections between AAFS and the Trump administration, and the President's political network.
- Civil society and non-governmental organizations should seek additional funding and investments from European governments and the U.S. government to facilitate democracy, rule of law, and governance programming in Bosnia and Herzegovina.



William R. Keating
Ranking Member
Subcommittee on Europe



Gregory W. Meeks
Ranking Member
House Committee on Foreign
Affairs



Jim Costa
Member of Congress



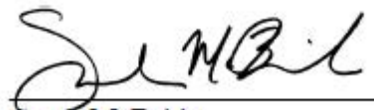
Julie Johnson
Member of Congress



Dina Titus
Member of Congress



Gabe Amo
Member of Congress



Sarah McBride
Member of Congress

ANNEXES

Congress of the United States
Washington, DC 20515

November 12, 2025

The Honorable Scott Bessent
Secretary of Treasury
U.S. Department of Treasury

The Honorable Marco Rubio
Secretary of State
U.S. Department of State

Dear Secretary Bessent and Secretary Rubio,

We write in strong opposition to the October 29, 2025, announcement that the Treasury Department's Office of Foreign Assets Control removed former President of Republika Srpska Milorad Dodik, his family members, dozens of his affiliates, and others sanctioned for destabilizing actions in the Western Balkans from the Specially Designated Nationals (SDN) List.

For thirty years, the United States has supported and bolstered the Dayton Peace Accords. The removal of these sanctions runs counter to bipartisan foreign policy towards the Western Balkans. It provides destabilizing actors in Republika Srpska, including Mr. Dodik, a free hand in supporting further destabilizing and secessionist rhetoric and undermining Bosnia and Herzegovina's sovereignty, territorial integrity, and multi-ethnic character. Moreover, it raises significant concern regarding this administration's willingness to stand up to corrupt and pro-Kremlin actors in the Western Balkans.

For years, Milorad Dodik and his affiliates have engaged in secessionist activity that has undermined the fragile peace in Bosnia and Herzegovina. Most recently in August 2025, the Constitutional Court of Bosnia and Herzegovina confirmed Mr. Dodik's conviction on a one-year prison sentence that may be exchanged for a fine as well as a six-year ban on his participation in politics. Mr. Dodik, who is no longer President of Republika Srpska, continues to deny the verdict, further undermining the Dayton Peace Accords, rule of law, and regional stability in the Western Balkans.

Dodik is not alone in stoking secessionist activity in Republika Srpska. Dodik affiliates as well as his family members, including his son Igor Dodik and daughter Gorica Dodik (both delisted in the October 29th announcement), have used their corrupt connections to enrich themselves, depriving the people of Bosnia and Herzegovina of a fair shot and undermining the Dayton Peace Accords and decades of U.S. foreign policy in the Western Balkans. Dodik, his family, and their affiliates deserve a swift response and meaningful accountability for their actions, not leniency.

Given Mr. Dodik's destabilizing activities have not ceased, we urge your departments to reverse course. We also request answers to the following questions regarding the delisting of Mr. Dodik and dozens of his affiliates from the SDN List by Wednesday, November 26, 2025.

1. Why did the Office of Foreign Assets Control remove Mr. Dodik, his son and daughter, and other affiliates from the SDN List?
2. What change in behavior did each of the individuals and entities delisted in the October 29, 2025, announcement demonstrate to warrant the removal of their names from the SDN List?
3. How does the removal of these individuals from the SDN List further U.S. interests in the Western Balkans and in Bosnia and Herzegovina?

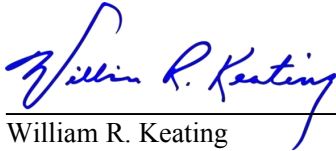
ANNEX 1

4. How does the removal of these individuals from the SDN list further Bosnia and Herzegovina's sovereignty, territorial integrity, and multi-ethnic character?
5. How do the Departments of State and Treasury plan to impose further costs on Mr. Dodik for his destabilizing actions in the Western Balkans?

Despite recent court rulings and continued international pressure, Mr. Dodik's actions in the Republika Srpska have not changed. It is critical the United States uses all tools at its disposal to put a stop to his destabilizing actions in the region and prevent a deterioration of the situation in Bosnia and Herzegovina. This includes implementing additional financial sanctions and visa bans against Dodik and his network, expanding diplomatic activity and assistance to strengthen Bosnia and Herzegovina's fragile peace, and appointing a U.S. Special Envoy for the Western Balkans. With these actions in mind, we look forward to your answers to our questions.

Thank you for your attention to this matter.

Sincerely,



William R. Keating
Ranking Member
Subcommittee on Europe



Gregory W. Meeks
Ranking Member
House Committee on Foreign
Affairs



United States Department of State

Washington, D.C. 20520

December 3, 2025

The Honorable
William R. Keating, Ranking Member
Subcommittee on Europe
House of Representatives
Washington, DC 20515

Dear Ranking Member Keating:

Thank you for your letter regarding U.S. policy in Bosnia and Herzegovina (BiH).

When the Trump Administration took office, BiH was facing an increasingly destabilizing and unsustainable constitutional and political crisis. The Administration engaged in decisive, discreet diplomacy to de-escalate the situation.

The outcome advanced U.S. interests in BiH and the Western Balkans. On October 18, the Republika Srpska National Assembly (RSNA) withdrew most of the anti-Dayton legislation it had passed in recent years. Additionally, the RSNA decision to appoint an interim Republika Srpska president affirmed the legal cohesion of the BiH state.

In response to these positive steps, the United States removed sanctions on RS individuals and entities that had been designated due to their support for the now reversed anti-Dayton legislation passed by the RSNA. Other individuals and entities were removed from sanctions because their original designation was based on their support to, or their actions on behalf of, Dodik as a sanctioned and “blocked person.”

We are hopeful that for the first time in many years, BiH is not facing a constitutional or political crisis. The U.S. government opened a path for BiH leaders to engage constructively to pursue a more stable future for their country, one in which local actors drive local solutions. The United States will continue to work with all parties in BiH and use all the tools at its disposal to promote stability, security, and mutual prosperity.

We hope this information is helpful. Please do not hesitate to contact us if we can be of further assistance.

Sincerely,



Paul D. Guaglianone
Senior Bureau Official
Bureau of Legislative Affairs

WILLIAM R. KEATING
9th DISTRICT, MASSACHUSETTS

COMMITTEE ON FOREIGN AFFAIRS
SUBCOMMITTEE
RANKING MEMBER
EUROPE
MIDDLE EAST AND NORTH AFRICA

COMMITTEE ON ARMED SERVICES
SUBCOMMITTEE
INTELLIGENCE AND SPECIAL OPERATIONS
CYBER, INFORMATION TECHNOLOGIES, AND
INNOVATION



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Washington, DC 20515

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April 13, 2026

The Honorable Marco Rubio
Secretary of State
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

Dear Secretary Rubio,

I am deeply concerned regarding the U.S. government's decision to facilitate contract negotiations with AAFS Infrastructure and Energy LLC (AAFS) for the Bosnian Southern Interconnection Pipeline natural gas contract. I am further concerned the Department has endorsed domestic legislation in the Parliament of the Federation of Bosnia and Herzegovina that seeks to ensure AAFS is the only company eligible to receive the contract. AAFS is a company without a proven record of cooperation with the U.S. government, experience in the oil and gas sector, or regional expertise.¹ I support U.S. involvement in the construction of the Southern Interconnection Pipeline and understand the national security implications of the pipeline. However, I am troubled that the potential awarding of this contract to an inexperienced firm decreases the likelihood the pipeline will be put into operation. Additionally, the personal and political ties between AAFS and the Trump administration represent an unfair conflict of interest. Put simply, I believe the Trump administration's diplomatic backing and support of AAFS Infrastructure and Energy LLC exemplifies a larger problem with this administration of personal relationships trumping industry and regional experience.

For more than 30 years, the United States has been committed to the sovereignty, territorial integrity, and multi-ethnic character of Bosnia and Herzegovina. While not without issues, the Dayton Peace Accords remain the bedrock of peace and stability in Bosnia, and I firmly believe that any attempts to undermine the Accords would hinder both regional stability and the U.S. national interest. For these reasons and others, I strongly support the construction of the Southern Interconnection Pipeline in Bosnia to create opportunities for Bosnian energy diversification and, importantly, to remove a key source of Russian influence from the region. I also strongly support U.S. leadership of this project as a means of expanding U.S. investment in Bosnia and ensuring the long-term energy security of Bosnia and Herzegovina.

While U.S. leadership in the construction of the Southern Interconnection Pipeline is essential, I am alarmed that AAFS will be entering into contract negotiations to build, operate, and maintain the pipeline. According to

¹ "Trump-linked figures lead talks on \$200m European pipeline contract," The Guardian, January 16, 2026, <https://www.theguardian.com/us-news/2026/jan/16/rump-linked-figures-talks-european-pipeline-contract>.

recent reporting, AAFS “has no apparent track record in the industry.”² Even its own website does not list any projects in the energy sector, nor the region, nor does it disclose the names of any of its corporate officers or other employees. AAFS was incorporated as an LLC in November 2025, less than six months before being awarded the contract.³ Furthermore, the company does not exhibit any financial wherewithal to undertake this project or provide security guarantees that the project will be completed within the proposed budget and timeframe.

Just as concerning as AAFS’s lack of experience in the energy sector are the direct personal and financial ties between its President, Joseph Flynn, and Vice President, Jesse Binnall, and the Trump administration and destabilizing entities in the Republika Srpska. These apparent conflicts of interest raise serious concerns regarding whether the Administration’s support for AAFS is based on a fair and transparent assessment and whether any additional companies were considered for the project.

First, both Joseph Flynn and Jesse Binnall, who continue to spread baseless claims about voter fraud during the 2020 presidential election, including in testimony before Congress, have direct personal and professional ties to President Trump.⁴ More directly, Mr. Binnall served on President Trump’s legal defense team in 2020 in the civil cases brought against the then-former President as a result of the January 6th violent insurrection. In return for Mr. Binnall’s legal services, the Trump-affiliated Save America PAC (FEC ID: C00762591) paid Mr. Binnall’s Binnall Law Group \$191,075.24 for “Legal Consulting.”⁵ Mr. Joseph Flynn, brother of former Trump National Security Advisor Michael Flynn, once served as a Director at a now-dissolved Florida-based non-profit organization called “Defending the Republic” alongside MyPillow CEO Mike Lindell.⁶ Disgraced Trump-affiliated lawyer Sidney Powell served as Chairman of the Board.⁷ Mr. Binnall’s defense of Mr. Trump and Mr. Joseph Flynn’s connections with numerous Trump-affiliated officials and individuals raise serious questions about the validity of AAFS’s bid for the contract for the Bosnia Gas Interconnection Pipeline.

In addition to their direct ties to Mr. Trump, Joseph Flynn’s close connection with his brother, former National Security Advisor Michael Flynn, raises additional questions about AAFS’s work in the Balkans. As you know, the former President of Republika Srpska, Milorad Dodik, has long spread destabilizing rhetoric and pushed secessionist legislation in Republika Srpska. For these reasons, previous U.S. administrations imposed sanctions on Dodik and his affiliates.

To persuade the second Trump administration to remove these sanctions, Dodik hired numerous Trump affiliated lobbyists for more than \$300,000 a month to advocate on his behalf, including former New York City

² “Trump-linked figures lead talks on \$200m European pipeline contract,” The Guardian, January 16, 2026, <https://www.theguardian.com/us-news/2026/jan/16/rump-linked-figures-talks-european-pipeline-contract>.

³ “Detail- AAFS Infrastructure and Energy L.L.C.,” Wyoming Secretary of State, November 24, 2025, <https://wyobiz.wyo.gov/business/FilingDetails.aspx?eFNum=022215174024087053093061222056116201134168091002>.

⁴ “Witness Statement of Jesse Binnall,” Senate Homeland Security and Governmental Affairs Committee, December 16, 2020, <https://www.hsgac.senate.gov/wp-content/uploads/imo/media/doc/Testimony-Binnall-2020-12-16.pdf>.

⁵ “Itemized Disbursements, All Listed Line Numbers. Committee: SAVE AMERICA,” Federal Election Commission, <https://docquery.fec.gov/cgi-bin/forms/C00762591/1752799/sb/ALL>.

⁶ “Detail by Entity Name: DEFENDING THE REPUBLIC, INC,” Florida Division of Corporations, <https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=DEFENDINGREPUBLIC%20N210000020790&aggregateId=domnp-n21000002079-e0a9fee5-81ae-4140-af29-e77c7e066ba5&searchTerm=defending%20the%20republic&listNameOrder=DEFENDINGREPUBLIC%20N210000020790>.

⁷ “Articles of Dissolution,” Florida Department of State, May 21, 2021, <https://search.sunbiz.org/Inquiry/CorporationSearch/ConvertTiffToPDF?storagePath=COR%5C2021%5C0522%5C66830252.tif&documentNumber=N21000002079>.

mayor Rudy Giuliani, right-wing activist Laura Loomer, and former Illinois governor Rod Blagojevich.⁸ Included in this list of lobbyists is former National Security Advisor Michael Flynn, brother of the aforementioned Joseph Flynn.⁹ On October 29th, 2025, President Trump lifted all U.S. sanctions against Mr. Dodik as well as his affiliates despite no meaningful change in behavior from Dodik. In addition, Dodik was welcomed to the United States in February 2026 in meetings with several senior members of the Trump administration, including Secretary of Defense Pete Hegseth.¹⁰

In response to a letter I wrote in late 2025, your Department claimed that the removal of the sanctions on Mr. Dodik “advanced U.S. interests in BiH and the Western Balkans” and that the Department engaged in “decisive, discreet diplomacy to de-escalate the situation.”¹¹ While I appreciate the Department’s focus on the Western Balkans, I believe the removal of the sanctions on Mr. Dodik at the behest of Trump-affiliated lobbyists like Michael Flynn raises serious questions about the role and influence of outside lobbying firms in this administration’s decision making. More so, it calls into question the subsequent Administration decision to support the future awarding of the Bosnian Southern Interconnection Pipeline contract to a firm with no government, regional, or energy sector experience, headed by the brother of one of Mr. Dodik’s chief lobbyists.

Mr. Secretary, the appearance of a conflict of interest regarding the contract for the Bosnian Southern Interconnection Pipeline raises serious concerns about the role of the Department in this project. This includes the Department’s numerous social media posts supporting the passage of domestic legislation in the Parliament of the Federation of Bosnia and Herzegovina that facilitated AAFS’s direct control over the project.^{12,13} The potential for outside groups and those affiliated with President Trump to profit from government contracts raises additional cause for investigation that this administration must not ignore.

So that Congress can better understand the goals of the Southern Interconnection Project and conduct our constitutional oversight responsibilities, I request that you provide written responses to the following questions by Monday, April 27, 2026, and a subsequent follow up briefing to discuss the project.

1. Please provide the list of companies considered by the State Department for the contract for the Southern Interconnection Pipeline as well as a list of companies which approached the State Department expressing interest in the project.
2. Please characterize the role of the State Department in the Southern Interconnection Pipeline project. Were U.S. officials involved in drafting or promoting changes to the Law on the Southern Interconnection? Did U.S. officials engage officials in the Parliament of the Federation of Bosnia and Herzegovina to facilitate the passage of domestic legislation to support AAFS’ role in the project?
3. What is the State Department’s plan to ensure this project is completed within proposed timelines and budgets? Where does the State Department believe financing for this project will come from?
4. Please provide examples of projects completed by AAFS that warrant the company being chosen for the pipeline project.

⁸ “Sanctions Lifted on a Putin-Backed Autocrat After Lobbying by Trump Allies,” The New York Times, October 29, 2025, <https://www.nytimes.com/2025/10/29/us/politics/milorad-dodik-sanctions-trump.html>.

⁹ “Sanctions Lifted on a Putin-Backed Autocrat After Lobbying by Trump Allies,” The New York Times, October 29, 2025, <https://www.nytimes.com/2025/10/29/us/politics/milorad-dodik-sanctions-trump.html>.

¹⁰ “Dodik and Cvijanović meet with Trump administration members in Washington,” European Western Balkans, February 6, 2026, <https://europeanwesternbalkans.com/2026/02/06/dodik-and-cvijanovic-meet-with-trump-administration-members-in-washington/>.

¹¹ “Letter to Congressman William R. Keating,” U.S. Department of State, December 3, 2025.

¹² Post from U.S. Embassy in Sarajevo X Account, April 1, 2026, <https://x.com/USEmbassySJJ/status/203936248388686990?s=20>

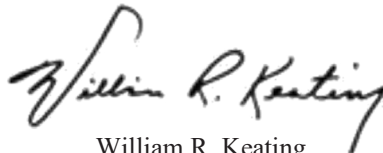
¹³ Post from U.S. Embassy in Sarajevo X Account, February 6, 2026, <https://x.com/USEmbassySJJ/status/2019795077732737268?s=20>

ANNEX 3

5. Please provide any communications between the White House and the State Department regarding AAFS Infrastructure and Energy LLC.
6. Please provide a list of meetings between State Department officials and Joseph Flynn, Jesse Binnall, or other representatives of AAFS since January 20, 2025. Please include the date, purpose, location, and participants of each meeting.
7. Please provide a list of meetings between the State Department and the Bosnia and Herzegovinian government (to include the government of the Federation of Bosnia and Herzegovina and the government of the Republika Srpska) regarding AAFS or this project.
8. Has the State Department had any discussions with the LNG import terminal in Croatia regarding this project, and if so, please provide dates of those meetings and summaries.
9. Has the State Department facilitated any meetings or discussions between AAFS and BiH (to include the government of the Federation of Bosnia and Herzegovina and the government of the Republika Srpska) officials? If so, please describe the events of these meetings, and provide details regarding their date and location.
10. Which other U.S. agencies provided support to the State Department throughout all work and meetings related to the pipeline project and its implementation?
11. Have Mr. Binnall and/or Mr. Joseph Flynn traveled to Bosnia in advance of, during, or after the negotiations for this contract? If so, please provide the dates and itineraries to include both official and unofficial meetings that were facilitated by the State Department for these trips.
12. Is the State Department aware of whether AAFS has engaged a local attorney in Bosnia? If so, please provide contact details.
13. Has the U.S. Embassy in Sarajevo or the State Department taken any meetings with Michael Flynn, Rod Blagojevic, Laura Loomer, or other lobbyists representing Milorad Dodik or his affiliates in relation to the Bosnian Southern Interconnection Pipeline contract?

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, reading "William R. Keating". The signature is fluid and cursive, with the first name "William" being the most prominent part.

William R. Keating
Ranking Member
House Foreign Affairs
Subcommittee on Europe



United States Department of State

Washington, D.C. 20520

May 13, 2026

The Honorable
William R Keating
House of Representatives
Washington, DC 20515

Dear Mr. Keating:

Thank you for your April 13 letter to Secretary Rubio regarding the Southern Interconnection gas pipeline between Croatia and Bosnia and Herzegovina (BiH). With the EU's decision to phase out Russian gas by the fall of 2027, BiH cannot afford any further delays in bringing this project to fruition. That is why the Administration has focused on working with partners across BiH who support the Southern Interconnection project because it serves BiH's interests: ensuring energy security, promoting economic development, and providing BiH leaders with the ability to choose suppliers based on reliability and price, not political pressure.

The United States has supported the Southern Interconnection project for almost a decade and has consistently engaged to facilitate conversations among Federation entity leaders to help bridge political differences and take the necessary steps to advance the project. The United States has provided technical assistance and advice to the Federation government to enable them to consider all available commercial options and pass legislation required to implement the project. In November 2025, Federation entity leaders proposed and then reached political consensus to construct and operate the Southern Interconnection pipeline under a concession model. Federation leaders subsequently selected a U.S. company as the lead project investor. The Federation of BiH Parliament overwhelmingly adopted amendments to the law on the Southern Interconnection (79-2-1 in the House of Representatives; 61-3-1 in the House of Peoples), enabling the project to move forward.

While the Administration will always advocate vigorously on behalf of American commercial interests, the decisions to offer a concession for the Southern Interconnection and to select a U.S. company as the lead investor were the sovereign choices made by Federation of BiH officials. The United States recognizes the Southern Interconnection as a strategically important project with significant economic and security benefits. At the same time, the U.S. firmly respects BiH's sovereignty.

The Department works to promote a fair and competitive environment for all U.S. companies seeking to do business in BiH – with the goal of seeing more U.S. companies in BiH as part of a robust agenda in pursuit of shared prosperity. This is good for the United States, and it is good for BiH.

The Administration is committed to BiH's sovereignty and territorial integrity and fully supports the peace and stability the Dayton Peace Agreement has brought to the country. Maintaining stability in BiH is a prerequisite for advancing U.S. interests in BiH and the wider Western Balkan region. A key pillar of U.S. policy in BiH is expanding our economic agenda, including the successful completion of the Southern Interconnection pipeline, which will allow U.S. liquid natural gas imports and displace Russian gas. The Department will continue to work closely with interagency partners, the private sector, and all relevant stakeholders in BiH to promote the project's success. In particular, our Embassy in Sarajevo will continue to advocate for the swift completion of the Southern Interconnection pipeline to ensure its intended benefits of shared economic prosperity are realized without delay.

We hope this information is helpful to you. Please let us know if we may be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Paul Guaglianone".

Paul D. Guaglianone
Senior Bureau Official
Bureau of Legislative Affairs

