

## **Pardons and commutations**

**He [Giuliani] also asked Ms. Dunphy if she knew anyone in need of a pardon, telling her that he was selling pardons for \$2 million, which he and President Trump would split. He told Ms. Dunphy that she could refer individuals seeking pardons to him, so long as they did not go through “the normal channels” of the Office of the Pardon Attorney, because correspondence going to that office would be subject to disclosure under the Freedom of Information Act.**

**From the verified complaint against Rudy Giuliani filed by Noelle Dunphy, his former Business Development director**