



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

March 9, 2021

FOIA Officer
Department of the Treasury
1500 Pennsylvania Ave., N.W.
Washington, DC 20220

Re: Freedom of Information Act Request

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) submits this request for records pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and U.S. Department of the Treasury (“Treasury”) regulations.

Specifically, CREW requests the following:

1. Records sufficient to show the total amount of government funds expended on former Treasury Secretary Steven Mnuchin’s January 2021 trip to the Middle East, including without limitation any invoices, receipts, or other records reflecting the costs of travel, security, accommodations, food, beverages, and incidental expenses incurred on the trip.
2. All communications sent by former Secretary Mnuchin from February 13, 2017, to January 20, 2021 concerning any sovereign wealth fund based in the Middle East, including without limitation any emails, text messages, or other records sent by Mr. Mnuchin mentioning any of the following terms:
 - “sovereign wealth fund”
 - “SWF”
 - “Abu Dhabi Investment Authority”
 - “ADIA”
 - “Kuwait Investment Authority”
 - “KIA”
 - “Public Investment Fund”
 - “PIF”
 - “Investment Corporation of Dubai”
 - “ICD”
 - “Qatar Investment Authority”
 - “QIA”
 - “Turkey Wealth Fund”
 - “Türkiye Varlık Fonu Yönetimi A.Ş.”

- “Mubadala”
 - “Emirates Investment Authority”
 - “EIA”
 - “Mumtalakat”
 - “Oman Investment Authority”
 - “OIA”
 - “Sovereign Fund of Egypt”
 - “Egypt Fund”
 - “Sharjah Asset Management”
3. All calendar entries reflecting any meetings from February 13, 2017, to January 20, 2021 attended by former Secretary Mnuchin and representatives of any sovereign wealth fund based in the Middle East, including without limitation calendar entries mentioning any of the following terms:
- “sovereign wealth fund”
 - “SWF”
 - “Abu Dhabi Investment Authority”
 - “ADIA”
 - “Kuwait Investment Authority”
 - “KIA”
 - “Public Investment Fund”
 - “PIF”
 - “Investment Corporation of Dubai”
 - “ICD”
 - “Qatar Investment Authority”
 - “QIA”
 - “Turkey Wealth Fund”
 - “Türkiye Varlık Fonu Yönetimi A.Ş.”
 - “Mubadala”
 - “Emirates Investment Authority”
 - “EIA”
 - “Mumtalakat”
 - “Oman Investment Authority”
 - “OIA”
 - “Sovereign Fund of Egypt”
 - “Egypt Fund”
 - “Sharjah Asset Management”
4. For any calendar entry identified as responsive to item number 3 above, all records reflecting the attendees, agenda items, minutes, summaries, readouts, or similar records relating to such meetings.
5. Records relating to any meetings former Secretary Mnuchin had with foreign government officials during his January 2021 trip to the Middle East, including without limitation records reflecting the meeting

attendees, agenda items, minutes, summaries, readouts, or similar records.

6. Records relating to any meetings former Secretary Mnuchin had with foreign government officials during his October 2020 trip to the Middle East, including without limitation records reflecting the meeting attendees, agenda items, minutes, summaries, readouts, or similar records.

If it is your position any portion of the requested records is exempt from disclosure, CREW requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. See *Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

Please be advised that CREW intends to pursue all legal remedies to enforce its right under the FOIA to access these documents. Accordingly, because litigation reasonably is foreseeable, the agency should institute an agency-wide preservation hold on documents potentially responsive to this request.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A) and agency regulations, CREW requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures likely will contribute to a better understanding of relevant government procedures by CREW and the general public in a significant way. See 5 U.S.C. § 552(a)(4)(A)(iii). Moreover, the request primarily and fundamentally is for non-commercial purposes. See, e.g., *McClellan Ecological v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

On February 23, 2021, the Washington Post reported that former Treasury Secretary Steven Mnuchin was “planning to start an investment fund that is expected to raise money from sovereign wealth funds in the Persian Gulf region.”¹ Mr. Mnuchin frequently traveled to the Middle East as Treasury Secretary, including in October 2020 and January 2021.² And his recently revealed “planned investment effort, coming so soon after leaving office, raises concerns over whether Trump administration policy was influenced by Mnuchin’s future pursuits.”³ The requested records will shed light on the extent of Mr. Mnuchin’s communications about and contacts with Middle Eastern

¹ Jeff Stein and Yeganeh Torbati, Trump’s former treasury secretary expected to launch investment fund, seeking backing of Persian Gulf state funds, *Washington Post*, Feb. 23, 2021, <https://wapo.st/38o3YN8>.

² *Id.*

³ *Id.*

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sovereign wealth funds during his time as Treasury Secretary—an issue of widespread public interest.

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and working to reduce the influence of money on politics. CREW uses a combination of research, litigation, and advocacy to advance its mission. CREW intends to analyze the information responsive to this request and to share its analysis with the public through reports, press releases, or other means. In addition, CREW will disseminate documents it acquires from this request to the public through its website, www.citizensforethics.org. The release of information obtained through this request is not in CREW's financial interest.

CREW further requests that it not be charged search or review fees for this request pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) because CREW qualifies as a member of the news media. *See Nat'l Sec. Archive v. U.S. Dep't of Defense*, 880 F.2d 1381, 1386 (D.C. Cir. 1989) (holding non-profit a "representative of the news media" and broadly interpreting the term to include "any person or organization which regularly publishes or disseminates information to the public").

CREW routinely and systematically disseminates information to the public in several ways. CREW's website receives tens of thousands of page views every month. The website includes blogposts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. In addition, CREW posts documents it receives under the FOIA on its website, which has been visited hundreds of thousands of times.

Under these circumstances, CREW satisfies fully the criteria for a fee waiver.

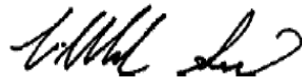
Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at (202) 408-5565 or nsus@citizensforethics.org. Also, if CREW's request for a fee waiver is not granted in full, please contact our office immediately upon making such a determination.

Where possible, please produce records in electronic format. Please send the requested records to me at either nsus@citizensforethics.org or Nikhel Sus, Citizens for Responsibility and Ethics in Washington, 1101 K St., N.W., Suite 201, Washington, D.C. 20005. Thank you for your assistance.

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Sincerely,

A handwritten signature in black ink, appearing to read "Nikhel Sus". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Nikhel Sus
Senior Counsel