



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

May 5, 2021

Kevin Tyrrell
FOIA Officer
United States Secret Service
Communications Center (FOIA/PA)
245 Murray Lane, SW Building T-5
Washington, D.C. 20223

Re: Freedom of Information Act Request

Dear FOIA Officer:

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

Specifically, CREW requests records sufficient to identify the total amount of government funds—including without limitation the total costs of lodging, travel, rental cars, meals, and incidental expenses—expended by the Secret Service to provide security for the below-listed individuals between December 1, 2020 to the date this request is processed, and records sufficient to identify the recipients of those expended funds:

1. Mark Meadows
2. Steven Mnuchin
3. Robert O’Brien
4. Ivanka Trump
5. Jared Kushner
6. Donald Trump Jr.
7. Eric Trump
8. Lara Trump
9. Tiffany Trump
10. Any other child, grandchild, son-in-law, daughter-in-law, or other relative of former President Trump
11. Any other individual designated by former President Trump or a member of his administration to receive Secret Service protection after the conclusion of former President Trump’s term of office

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes

of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as those who were cc'ed or bcc'ed on any emails.

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).

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).

Before leaving office, former President Trump reportedly “issued a directive to extend post-presidency Secret Service protection to his four adult children and two of their spouses” and at least three Trump administration officials: “former treasury secretary Steven Mnuchin, former chief of staff Mark Meadows and former national security adviser Robert C. O’Brien.”¹ It is “highly unusual for a departing president to provide 24-hour security to relatives who are adults long past their college years.”² It is “also rare for former administration officials to receive protection beyond the president’s term in office.”³ There is a compelling public interest in learning exactly how many taxpayer dollars have been spent on this unusual post-presidency extension of Secret Service protection, especially given that a significant share of the funds may have been expended at Trump’s own properties.

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

¹ Carol Leonnig and Nick Miroff, Trump extended Secret Service protection to his adult children and three top officials as he left office, *Washington Post*, Jan. 20, 2021, <https://wapo.st/3xFr5gW>.

² *Id.*

³ Luke Barr, Secret Service protection extended to Trump family members, ex-staffers, *ABC News*, Jan. 21, 2021, <https://abcn.ws/3eOjTLC>.

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.

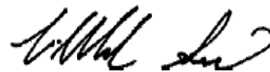
Under these circumstances, CREW satisfies fully the criteria for a fee waiver.

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 denied, 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.

Sincerely,



Nikhel Sus
Senior Counsel