



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

May 11, 2022

**SENT VIA EMAIL: FOIA@usss.dhs.gov**

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 (DHS) regulations.

Specifically, CREW requests all records relating to the expenditure of government funds to provide security and any other services for former Senior Advisor to the President Jared Kushner and former Secretary of the Treasury Steven Mnuchin’s travels to the Middle East from January 20, 2021, to the present.

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.

If it is your position that 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). If 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 former President Donald J. Trump left office in January 2021 he issued a directive extending Secret Service protection for six months to his adult children, their spouses, and three cabinet members including Secretary Mnuchin.<sup>1</sup> Throughout that time Mnuchin took at least three trips to the Middle East to raise money from sovereign wealth funds for his own investment fund.<sup>2</sup> Kushner also made at least one trip to the United Arab Emirates, though the purpose is unknown.<sup>3</sup>

While the President and his spouse are entitled to lifelong Secret Service protection, his choice to extend that privilege to his children and administration officials is highly unusual.<sup>4</sup> Kushner and Mnuchin's trips are reported to have cost thousands of dollars.<sup>5</sup> CREW is interested in seeing if there are additional costs associated with these or any other unreported trips. Trump, his family, and members of his administration have a history of taking expensive trips that are paid for by American taxpayers.<sup>6</sup> The requested records will show the full extent to which taxpayer funds have been used to provide Secret Service protection to Kushner and Mnuchin while on private travel overseas in pursuit of funding from sovereign wealth funds and other investors to support their post-employment investment fund activities.<sup>7</sup>

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

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<sup>1</sup> Fahrenthold, David and Carol D. Leonnig. "Trump gave six months extra Secret Service protection to his kids, three officials. It cost taxpayers \$1.7 million." *Washington Post*. September 17, 2021. [https://www.washingtonpost.com/politics/trump-secret-service-children-cost-mnuchin/2021/09/16/b9aa6348-156a-11ec-a5e5-ceecb895922f\\_story.html](https://www.washingtonpost.com/politics/trump-secret-service-children-cost-mnuchin/2021/09/16/b9aa6348-156a-11ec-a5e5-ceecb895922f_story.html)

<sup>2</sup> *Id.*

<sup>3</sup> Rohrlich, Justin. "Jared Kushner's May 2021 Stay at the Ritz-Carlton Abu Dhabi Cost U.S. Taxpayers Thousands." *Daily Beast*. May 17, 2021. <https://www.thedailybeast.com/jared-kushners-may-2021-stay-at-the-ritz-carlton-abu-dhabi-cost-taxpayers-dollar13000>

<sup>4</sup> Fahrenthold and Leonnig, *Washington Post*, Sept. 17, 2021.

<sup>5</sup> *Id.*

<sup>6</sup> Davis, Walker and Linnaea Honl-Stuenkel. "The Trump family is taking 12x more protected trips than the Obama family." *CREW*. April 10, 2020. <https://www.citizensforethics.org/reports-investigations/crew-investigations/trump-family-travel-12x-obama-family/>

<sup>7</sup> Kirkpatrick, David and Kate Kelly. "Before Giving Billions to Jared Kushner, Saudi Investment Fund Had Big Doubts." *New York Times*. April 10, 2022. <https://www.nytimes.com/2022/04/10/us/jared-kushner-saudi-investment-fund.html>

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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 any documents it acquires from this request to the public through its website, [www.citizensforethics.org](http://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 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 [rjacobs@citizensforethics.org](mailto:rjacobs@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 [rjacobs@citizensforethics.org](mailto:rjacobs@citizensforethics.org). If DHS is not able to provide the records electronically, please contact me to arrange an alternative method of transmission. Thank you for your assistance in this matter.

Sincerely,



Rebecca Jacobs  
Senior Researcher