



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

April 17, 2025

**BY EMAIL:** [FOIA@usss.dhs.gov](mailto:FOIA@usss.dhs.gov)

Kevin L. Tyrrell  
FOIA Officer/Public Liaison  
U.S. Secret Service FOIA Office  
245 Murray Lane Building T-5  
Washington, D.C. 20223

**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 Department of Homeland Security ("DHS") regulations.

Specifically, CREW requests records sufficient to identify the total amount of government funds expended by the Secret Service from January 20, 2025 to the date this request is processed at any business affiliated with the Trump Organization, including but not limited to the following properties:

1. The Mar-a-Lago Club
2. Trump National Golf Club Bedminster
3. Trump International Golf Club West Palm Beach
4. Trump National Doral Miami
5. Trump International Hotel Las Vegas
6. Trump National Golf Club Jupiter

The above request excludes agency records consisting solely of news articles, press clippings, and other publicly-available material, so long as the records include no accompanying discussion by agency officials.

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, and anyone who was 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). 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).

Please be advised that CREW intends to pursue all legal remedies to enforce its rights under FOIA. Accordingly, because litigation is reasonably foreseeable, the agency should institute an agency wide preservation hold on all 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 *id.* § 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).

During President Donald Trump's first term, he and his family insisted on staying at Trump-branded hotels and resorts, which required the Secret Service to spend millions in taxpayer funds at businesses that the president profits from.<sup>1</sup> According to the House Oversight Committee, Trump overcharged the Secret Service by as much as 300% for accommodations at his properties.<sup>2</sup> As of 2022, the Secret Service had spent almost \$2 million at his properties.<sup>3</sup> In his second term as president, Trump has once again failed to divest from his business interests, opening the door for even more Secret Service spending.<sup>4</sup> The requested records will shed light on the amount of taxpayer money being spent at Trump properties, a matter of significant 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

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<sup>1</sup> George Chidi, Trump overcharged Secret Service by 300% for accommodations at his hotels, *The Guardian*, Oct. 18, 2024 <https://shorturl.at/3pCNk>

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

<sup>3</sup> Jordan Libowitz and Caitlin Moniz, The Secret Service spent nearly \$2 million at Trump properties, *Citizens for Responsibility and Ethics in Washington*, May 23, 2022 <https://shorturl.at/YtI3R>

<sup>4</sup> Tracking Trump's visits to his properties and other conflicts of interest, *Citizens for Responsibility and Ethics in Washington*, April 10, 2025 <https://shorturl.at/7LXsY>

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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 disseminates information obtained through FOIA to the public in several ways. For example, CREW's website receives hundreds of thousands of page views every month. The website includes blog posts 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. These reports frequently rely on government records obtained through FOIA. CREW also posts the documents it obtains through FOIA on its website.

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 email me at [rjacobs@citizensforethics.org](mailto:rjacobs@citizensforethics.org) and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or call me at (202) 408-5565. 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 [rjacobs@citizensforethics.org](mailto:rjacobs@citizensforethics.org) and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or by mail to Rebecca Jacobs, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

A handwritten signature in black ink, appearing to be 'RJ', with a stylized flourish at the end.

Rebecca Jacobs  
Research Manager