



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

May 7, 2025

BY EMAIL: 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—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 January 20, 2025 to the date this request is processed, as well as records sufficient to identify the businesses, vendors, or other entities who received those expended funds:

1. Donald Trump Jr.
2. Eric Trump
3. Jared Kushner
4. Ivanka Trump
5. Baron Trump
6. Lara Lea Trump
7. Any other child, grandchild, son-in-law, daughter-in-law, or other relative of President Trump

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 in office, his family's frequent travel put a strain on the Secret Service's budget and contributed to "burnout" among Secret Service agents.¹ In just two fiscal years, the Trump family took 12 times more protected trips than the Obamas.² Much of this travel was to promote Trump Organization business, like Eric and Donald Trump Jr.'s 2017 trip to Dubai, which cost taxpayers \$250,000 in just one month.³ Right before leaving office, Trump made the unusual decision to extend Secret Service protection for his adult children and their spouses, resulting in even more spending.⁴ For example, Jared Kushner's post-Trump-administration trips to Qatar and the UAE cost the Secret Service more than \$16,000.⁵

¹ Walker Davis and Linnaea Honl-Stuenkel, The Trump family is taking 12x more protected trips than the Obama family, CREW, April 10, 2020 <https://shorturl.at/E6Irs>

² *Id.*

³ Jordan Libowitz, CREW gets Trump family business Secret Service spending documents, CREW, July 18, 2018, <https://shorturl.at/YBkEc>

⁴ Linnaea Honl-Stuenkel and Rebecca Jacobs, Secret Service spent more than \$16,000 on Kushner's UAE and Qatar trip. Both countries invested in his firm., CREW, April 12, 2023 <https://shorturl.at/qhX88>

⁵ *Id.*

Three months into Trump's second term, his adult children are continuing this trend. In March, Don Jr. traveled to Belgrade, where the Trump Organization is slated to build a new hotel.⁶ Earlier this month, the Economic Times reported that one or both Trump sons are likely to visit India by June to check up on a development.⁷

The president and his family are entitled to Secret Service protection and should be protected, but not at a cost that strains the agency's budget or is expensive for taxpayers. The requested records will illustrate the amount of money spent to protect Trump's family members on trips related to their business interests, a matter of compelling 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 any 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 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 and 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.

⁶ Eric Lipton, Donald Trump Jr. Mixes Business and Politics in Serbia, as Protests There Rage, *The New York Times*, March 19, 2025, <https://shorturl.at/lkHjA>

⁷ Trump Jr or Erik likely to visit India by June: Trump Towers Indian partner Kalpesh Mehta, *The Economic Times*, April 16, 2025, <https://shorturl.at/zwUsh>

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Where possible, please produce records in electronic format. Please send the requested records to rjacobs@citizensforethics.org and 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' followed by a stylized flourish.

Rebecca Jacobs
Research Manager