



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

May 27, 2025

FOIA/PA Mail Referral Unit  
Department of Justice Room 115  
LOC Building  
Washington, DC 20530-0001

**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 Justice ("DOJ") regulations.

Specifically, CREW requests, from January 20, 2025 until the date this request is processed:

1. The Memo that DOJ produced, discussed in further detail below, explaining that transfer of a luxury jet from the Qatari government to the U.S. Department of Defense and then to the Trump Presidential Library Foundation would be "legally permissible."<sup>1</sup>
2. Communications concerning the drafting of this memo, including the names of DOJ conflicts and ethics attorneys who were consulted.
3. Any and all ethics guidance Attorney General Bondi received concerning her past work on behalf of the government of Qatar.

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

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<sup>1</sup> See Jonathan Karl & Katherine Faulders, *Trump Administration Poised to Accept 'Palace in the Sky' as a Gift for Trump from Qatar: Sources*, ABC NEWS (May 11, 2025), <https://abcnews.go.com/Politics/trump-administrationpoised-accept-palace-sky-gift-trump/story?id=121680511>.

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 agencywide 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).

On May 11, 2025, President Trump confirmed reports that his administration planned to accept a \$400 million luxury jet plane from the Qatari royal family.<sup>2</sup> The plane, intended to be used as Air Force One, will then be donated to the Trump Presidential Library Foundation after President Trump leaves office.<sup>3</sup> Reporting indicates that President Trump may be able to use this luxury jet for personal travel after he leaves office.<sup>4</sup>

According to reports, Attorney General Bondi has signed a letter, approved by the DOJ Office of Legal Counsel, endorsing the gift's legality.<sup>5</sup> President Trump's decision to accept a luxury jet raises serious ethics, corruption, and security concerns. First, Congress has established a statutory system governing acceptance of such gifts, which does not appear to have been followed in this instance.<sup>6</sup> The gift may also violate the Constitution's Emoluments Clause which prohibits a President from accepting any present from a foreign state without the consent of Congress.<sup>7</sup> Furthermore, there are questions as to whether Attorney General Bondi should have recused herself from this matter, given her recent work serving as a lobbyist on behalf of the State of Qatar and failure to disclose this conflict on her Senate Judiciary Questionnaire prior to her confirmation to be Attorney General.<sup>8</sup>

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<sup>2</sup> Charlie Savage, *Trump's Plan to Accept Luxury Jet from Qatar Strains Bounds of Propriety*, NY Times (May 12, 2025), <https://www.nytimes.com/2025/05/12/us/trump-qatar-jet-plane.html>.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Hannah Rabinowitz, *DOJ lawyers cleared Pam Bondi's memo backing the legality of Trump accepting Qatari 747*, CNN (May 14, 2025), <https://www.cnn.com/2025/05/14/politics/bondi-justice-department-trump-qatar-747>.

<sup>6</sup> *See* 5 U.S.C. § 7432.

<sup>7</sup> U.S. Const. art. 1, § 9, cl. 8.

<sup>8</sup> *See* Senate Committee on the Judiciary Questionnaire for Pamela J. Bondi at 24-26, [https://www.judiciary.senate.gov/imo/media/doc/bondi\\_sjq\\_to\\_committee.pdf](https://www.judiciary.senate.gov/imo/media/doc/bondi_sjq_to_committee.pdf).

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](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 over 150,000 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. 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 [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or call (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 [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or by mail to Alex Goldstein, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

A handwritten signature in cursive script that reads "Alex Goldstein".

Alex Goldstein  
Associate Counsel