



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

August 25, 2025

U.S. Immigration and Customs Enforcement
FOIA Office
500 12th St SW
Washington, DC 20536

Re: Expedited 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 U.S. Immigration and Customs Enforcement ("ICE") regulations.

Specifically, CREW requests:

1. All records sufficient to show all sources of funding, including but not limited to appropriated funds and gifts, associated with President Trump's August 2025 deployment of ICE agents to the District of Columbia.
2. All records sufficient to show which units within ICE were reassigned to respond to President Trump's August 2025 deployment of federal agents to the District of Columbia.
3. All records sufficient to show the monthly budgets for the units within ICE that were reassigned to respond to President Trump's August 2025 deployment of federal agents to the District of Columbia.
4. All records sufficient to show training ICE provided to engage in the deployment of agents within the District of Columbia.
5. All guidance, memoranda, final directives, policies, and other documents produced by ICE concerning its role in the deployment of agents within the District of Columbia.
6. All guidance, memoranda, final directives, policies, and other documents that mention, reference, or relate to the mobilization of ICE agents in DC, including but not limited to documents that mention, reference, or relate to the preparation for or enforcement of the August 11, 2025 Executive Order entitled "DECLARING A CRIME EMERGENCY IN THE DISTRICT OF COLUMBIA".

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 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 August 11, 2025, President Trump signed an executive order declaring a “crime emergency” in the District of Columbia, announced that the federal government would take control of the Metropolitan Police Department (MPD), the National Guard would be deployed, and that federal law enforcement agencies would reassign staff to patrol the city.¹ Attorney General Bondi stated that career Department of Justice staff would be involved in this effort.² The agencies involved reportedly include the Federal Bureau of Investigation,

¹ Exec. Order, Declaring a Crime Emergency in the District of Columbia (Aug. 11, 2025) <https://www.whitehouse.gov/presidential-actions/2025/08/declaring-a-crime-emergency-in-the-district-of-columbia/>; National Guard Task Force Mobilized to Restore Safety in Nation's Capital (Aug. 11, 2025) <https://www.defense.gov/News/News-Stories/Article/Article/4271502/national-guard-task-force-mobilized-to-restore-safety-in-nations-capital/>; Brian Mann, *Trump asserts control of Washington, D.C., police, will deploy National Guard in nation's capital*, NPR (Aug. 11, 2025) <https://www.npr.org/2025/08/11/nx-s1-5497749/dc-trump-crackdown-crime>.

² Eric Katz, *Trump federalizes D.C. police, says takeover will enable federal employees to work in peace*, Government Executive (Aug. 11, 2025)

Department of Defense, Department of Homeland Security, US Park Police, US Capitol Police, US Marshals Service, United States Secret Service, Bureau of Alcohol, Tobacco, Firearms, and Explosives, US Customs and Border Protection and the Drug Enforcement Administration.³ It was later reported that ICE would be joining MPD patrols.⁴ Army Col. Larry Doane was reportedly tasked with running a joint task force with oversight of the deployment.⁵ Trump attempted to assign oversight of DC's MPD to Attorney General Pam Bondi and DEA administrator Terry Cole.⁶

On August 15, 2025, DC Attorney General Brian Schwalb sued the Trump administration to block the federal takeover of DC MPD and naming of Cole as the "emergency police commissioner."⁷ MPD Chief Pamela Smith said in a declaration in the case that she was not alerted about the takeover until President Trump's press conference and raised alarm about the impact on public safety, saying: "In my nearly three decades in law enforcement, I have never seen a single government action that would cause a greater threat to law and order than this dangerous directive."⁸ On August 16, 2025, following an emergency court hearing, the Trump administration rescinded its order replacing the MPD police chief.⁹ This rescission, however, does not affect the deployment of National Guard in DC, nor the deployment of other federal agents in DC. The requested records are needed to provide the public with transparency about the planning for and the cost of this unprecedented, dangerous, and apparently unlawful federal takeover of Washington, DC's law enforcement capabilities and the federal law enforcement deployment in DC. These records will also help the public understand what other programs may be deprioritized as a result of the reassignment of agents and career staff.

<https://www.govexec.com/management/2025/08/trump-federalizes-dc-police-says-takeover-will-enable-federal-employees-work-peace/407363/>.

³ Nicholas Bogel-Burroughs, Darren Sands, and Ashley Ahn *D.C. Federal Deployment Ramps Up as Protesters Converge on Police Checkpoint*, New York Times (Aug. 13, 2025)

<https://www.nytimes.com/2025/08/13/us/politics/national-guard-dc-trump-takeover.html>; David Smith, *Trump seizes control of Washington DC police and deploys national guard*, The Guardian (Aug. 11, 2025)

<https://www.theguardian.com/us-news/2025/aug/11/trump-washington-dc-crime>.

⁴ Teo Armus, et al., *ICE is joining D.C. police patrols. Moped drivers are getting detained.*, Wash. Post (Aug. 21, 2025)

<https://www.washingtonpost.com/dc-md-va/2025/08/21/dc-police-ice-moped-crackdown-delivery-d-rivers/>.

⁵ Anne Faherty and Luke Barr, *National Guard troops have begun 24-hour operations in DC: Official*, ABC (Aug. 14, 2025)

<https://abcnews.go.com/Politics/dc-wake-troops-deployed-national-mall/story?id=124629956>.

⁶ Alanna Durkin Richer, *A tale of two Chief Pams: Federal takeover brings confusion over command of DC police*, Associated Press (Aug. 13, 2025)

<https://apnews.com/article/trump-federal-takeover-dc-police-command-baf3566c1a9d1a07d2f7b8d5ad7ff957>.

⁷ DISTRICT OF COLUMBIA v. DONALD J. TRUMP, 1:25-cv-02678, ECF No. 1 (D.D.C. Aug 15, 2025),

<https://www.courtlistener.com/docket/71116258/1/district-of-columbia-v-donald-j-trump/>.

⁸ Declaration of Pamela A. Smith, DISTRICT OF COLUMBIA v. DONALD J. TRUMP, 1:25-cv-02678, ECF No. 2-3 (D.D.C. Aug 15, 2025),

<https://www.documentcloud.org/documents/26052560-pamsmithdeclarationoagtrumpsuit/>.

⁹ Madeline Halpert, *DC police chief retains command after deal with Trump administration*, BBC (Aug. 16, 2025)

<https://www.bbc.com/news/articles/c2018769n1yo>.

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 over 90,000 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.

Expedited Processing Request

CREW is entitled to expedited processing because there is an "urgency to inform the public concerning actual or alleged Federal Government activity," and CREW "is primarily engaged in disseminating information," 5 U.S.C. § 552(6)(E)(v)(II). In addition, DHS should grant expedited processing because there is "[a] matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence." 6 C.F.R. § 5.5(e)(1)(iv).

1. CREW is "primarily engaged in disseminating information" to the public. This "standard 'requires that information dissemination be the main [and not merely an incidental] activity of the requestor,'" but "publishing information 'need not be [the organization's] sole occupation.'" *Protect Democracy Project, Inc. v. U.S. Dep't of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017). CREW routinely disseminates information obtained through FOIA to the public in several ways. For example, CREW's website receives tens 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. CREW is a credible requestor and disseminator of information often relied on by major media outlets.¹⁰

The facts demonstrate that (1) the request concerns a matter of current exigency to the American public; (2) the consequences of delaying a response would compromise a significant recognized interest; and (3) the request concerns federal government activity. *Al-Fayed v. C.I.A.*, 254 F.3d 300, 310 (D.C. Cir. 2001).

First, the requested records concern a matter of current exigency to the American public insofar as they are “the subject of a currently unfolding story” about the extraordinary mobilization of federal agents in Washington, DC.¹¹ *Id.* As explained in the request for a fee waiver, above, President Trump has deployed National Guard troops and federal agents from various agencies to conduct law enforcement in the nation’s capital. The attorney general for the District of Columbia, mayor of the District of Columbia and police chief of the Metropolitan Police Department have challenged the legality of the federal takeover of the police department.¹² On August 15, 2025, Attorney General Schwalb filed an emergency lawsuit to stop the takeover and called it, “the gravest threat to Home Rule that the District has ever faced,” demonstrating clear urgency for public information about the mobilization. The American people, Congress and particularly residents of the District of Columbia deserve answers about the nature of the mobilization, particularly as local leaders have raised alarm about implications for the District’s self governance and public safety.¹³

Second, the requested records concern a matter of current exigency to residents of the District of Columbia as they navigate a potentially illegal, dangerous and unprecedented show of federal force in their city. The American public, and especially residents of DC, urgently need the information in the requested communications, directives and memoranda

¹⁰ See, e.g., *Citizens for Responsibility and Ethics in Washington*, The New York Times, <https://www.nytimes.com/topic/citizens-for-responsibility-and-ethics-in-washington> (last visited July 14, 2025) (list of New York Times articles referencing CREW spanning over a decade); Ed Pilkington and Dharna Noor, *Top US ethics watchdog investigating Trump over dinner with oil bosses*, The Guardian (May 15, 2024), <https://www.theguardian.com/us-news/article/2024/may/15/ethics-watchdog-investigating-trump-big-oil> (referring to CREW as “Top US ethics watchdog”).

¹¹ Teo Armus, Dan Rosenzweig-Ziff, Emily Davies, Jonathan Baran and Mariana Alfaro, ICE is joining D.C. police patrols. Moped drivers are getting detained, The Washington Post (Aug. 22, 2025), <https://www.washingtonpost.com/dc-md-va/2025/08/21/dc-police-ice-moped-crackdown-delivery-rivers/>.

¹² See *supra* note 6, 7 & 8.

¹³ Norton Statement After President Trump Federalizes D.C. Police and Activates D.C. National Guard (Aug. 11, 2025) <https://norton.house.gov/media/press-releases/norton-statement-after-president-trump-federalize-dc-police-and-activates-dc>.

in order to understand (1) the legality of the deployment, (2) the authority that the current administration understands itself to have with respect to the conduct of the current deployment, (3) the funding sources and resources being expended on the current deployment, and (4) the parameters by which additional deployments might be ordered. As local leaders have noted, this takeover is more likely to do harm to public safety than to help keep residents safe by sowing confusion and delays in MPD.¹⁴ National Guard troops are expecting and preparing to carry weapons, further intensifying safety concerns.¹⁵ The takeover has already had tangible effects on DC residents; notably, a combination of federal and local law enforcement created a vehicle checkpoint on 14th Street NW, carried out arrests, patrolled landmarks and displaced members of DC's unhoused community by targeting encampments.¹⁶ Courts have found the requisite urgency for expedited processing of records requested in the course of debates about the "legality" of "high-profile government action" when that action had the potential to escalate and could lead to bodily harm. *Protect Democracy Project, Inc. v. U.S. Dep't of Def.*, 263 F. Supp. 3d 293, 299–301 (D.D.C. 2017) (internal quotation marks and citations omitted). The court found urgency to exist because the consequences of keeping the American public in the dark could not be "restarted or wound back." *Id.* The same is true here. The need for public information regarding the legality, justifications, and scope of the federal law enforcement deployment is exceptionally urgent given that DC has opposed aspects of the deployment as unlawful. There has already been "widespread media attention" paid to the federal takeover of DC law enforcement, suggesting a matter of urgency, both to understand its legality,¹⁷ and to understand how federal agencies such as ICE, DHS and DOD

¹⁴ See *supra* note 8.

¹⁵ Vera Bergengruen, Lara Seligman, and Micah Maidenber, More National Guard Soldiers Head to D.C. and Prepare to Carry Weapons, *The Wall Street Journal* (Aug. 18, 2025), <https://www.wsj.com/politics/national-security/national-guard-soldiers-prepare-to-carry-weapons-in-washington-d-c-3965923c?st=Mq2q2F>.

¹⁶ Donald Sherman, *DC is a frequent target of Trump's strongman actions. Our democracy could be collateral damage.* (Aug. 18, 2025) <https://www.citizensforethics.org/news/analysis/dc-is-a-frequent-target-of-trumps-strongman-actions-our-democracy-could-be-collateral-damage/>.

¹⁷ Shanla Shelton and Kaanita Iyer, *Three GOP-led states to send hundreds of National Guard troops to DC as White House escalates police takeover*, CNN (Aug. 16, 2025), <https://www.cnn.com/2025/08/16/politics/west-virginia-national-guard-being-sent-to-dc>; Lindsay Whitehurst, Stephen Groves, Ashraf Khalil, and Alanna Durkin Richer, *Trump administration agrees to keep DC police chief in place, but with immigration enforcement order*, Associated Press (Aug. 15, 2025), <https://apnews.com/article/washington-dc-trump-federal-police-takeover-lawsuit-eacd387053520c9e3640c2f91924deeb>; Brian Mann and Chandelis Duster, *Hundreds march to White House to protest Trump's D.C. crackdown*, NPR (Aug. 16, 2025), <https://www.npr.org/2025/08/16/nx-s1-5504861/trump-dc-protest-federal-takeover-white-house-6e0d9705e0d47958611>; Rebecca Schneid, *White House Backs Off 'Hostile Takeover' of D.C. Police Chief Role*, TIME (Aug. 16, 2025), <https://time.com/7310140/dc-national-guard-federal-police/>; Meagan Flynn, Jenny Gathright, and Jonathan Edwards, *Immigration enforcement shaped first week of Trump's D.C. takeover*, The Washington Post (Aug. 18, 2025), <https://www.washingtonpost.com/dc-md-va/2025/08/18/trump-dc-takeover-crime-immigration/>; Alexandra Marquez and Gordon Lubold, *Some National Guard troops in Washington set to carry firearms*, NBC News (Aug. 16, 2025),

are operationalizing President Trump's August 11, 2025 executive order. Residents of the District of Columbia fund their local police department and depend on it to keep the city safe. They deserve answers about the federal government's actions, how the deployment is impacting their community and what if any steps were taken in advance to prepare.

The requested records similarly implicate a matter of current exigency to all American taxpayers as they are funding this unprecedented military deployment in the nation's capitol. President Trump and the Department of Government Efficiency have engaged in an unprecedented effort to cut public funding for government agencies and services in the name of increasing government efficiency and cutting down on waste, fraud and abuse.¹⁸ As Trump has emphasized the need to cut costs, the American people have a right to understand the cost of this massive mobilization of federal resources in the District of Columbia so that they might judge for themselves whether the benefits outweigh the costs.

Finally, the reassignment of federal agents and career staff to patrol the District of Columbia concerns quintessential federal government activity.

2. The same facts raise possible questions, in "[a] matter of widespread and exceptional media interest involving questions about the Government's integrity which affect public confidence." 6 C.F.R. § 5.5(e)(1)(iv). As described above, the deployment of federal troops and takeover of MPD in the District of Columbia is happening under unclear legal authority and has been challenged in court by DC's attorney general.¹⁹ There has already been widespread coverage discussing the extreme step of deploying federal law enforcement and the implications for DC's self governance.²⁰ Furthermore, the crime statistics cited by President Trump to justify the takeover also "do not stand up to scrutiny," undermining the factual predicate for the

<https://www.nbcnews.com/politics/politics-news/west-virginia-governor-deploys-national-guard-dc-trump-police-takeover-rcna225386>; Jacob Rosen, *DOJ removes newly named D.C. emergency police chief, agrees to rewrite Bondi directive on immigration*, CBS News (Aug. 15, 2025),

<https://www.cbsnews.com/news/d-c-sues-trump-bondi-over-federal-takeover-of-d-c-police/>; Campbell Robertson and Zach Montague, *Trump Administration Backs Off New Attempt to Widen Control of D.C. Police*, The New York Times (Aug. 15, 2025),

<https://www.nytimes.com/2025/08/15/us/washington-dc-police-trump-lawsuit.html>; Daniel Barnes, Kyle Cheney, and Nicole Markus, *Trump admin backs down on DC police control after striking deal*, Politico (Aug. 15, 2025),

<https://www.politico.com/news/2025/08/15/doj-dc-police-department-control-hearing-00512503>.

¹⁸ Jason Powell and Sasha Frank-Stempel, *DOGE's big illusion: the heavy costs of the Trump administration's so-called efficiency* (June 23, 2025)

<https://www.citizensforethics.org/reports-investigations/crew-reports/doges-big-illusion-the-heavy-costs-of-the-trump-administrations-so-called-efficiency/>.

¹⁹ See *supra* note 6, 7 & 8.

²⁰ See *supra* note 16.

deployment in the first place.²¹ And this remains a developing story, with six states announcing that they are sending National Guard troops to DC, increasing the need for information about the legal authority for the administration's actions as soon as possible.²² Furthermore, questions remain if the strategy that is being carried out in DC will be implemented in other cities, given President Trump's comments at the press conference announcing the takeover where he also mentioned Chicago, Oakland and Baltimore as other potential targets.²³ The lack of public information regarding the president's actions, which are potentially beyond his legal authority, raises significant possible questions of widespread and exceptional public interest regarding the integrity of the federal government.

The undersigned certifies that the above statement is true and correct.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at mimran@citizensforethics.org and foia@citizensforethics.org or call me at (484)-866-1136. 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 mimran@citizensforethics.org and foia@citizensforethics.org or by mail to Mahnoor Imran, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, DC 20044.

Sincerely,

Mahnoor Imran
Press Associate

²¹ Gabriella Lazor, Samantha Putterman, Maria Ramirez Uribe and Amy Sherman. *Trump exaggerates Washington, DC, crime while ordering police takeover and National Guard deployment* (Aug. 11, 2025) <https://www.politifact.com/article/2025/aug/11/trump-washington-dc-crime-rate-homicide/>.

²² Elizabeth Crisp. *Here are the states sending National Guard troops to DC* (Aug. 19, 2025) <https://thehill.com/homenews/state-watch/5459043-states-send-troops-trump-dc/>.

²³ Asawin Suebsaeng and Ryan Borg. *Trump's Military Crackdowns Are Only Going to Get Worse* (Aug. 13) <https://www.rollingstone.com/politics/politics-features/trump-military-crackdown-get-worse-1235406382/>.