

July 31, 2025

SUBMITTED VIA FOIA PAL

FOIA Officer U. S. Department of State Information Access Liaison Office, A/SKS/IAP/IAL 2201 C Street N.W., Suite B266 Washington, D.C. 20520-0000

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 State ("DOS") regulations.

Specifically, CREW requests records sufficient to identify any expenditures by DOS at properties owned by President Donald Trump between January 20, 2025 and the present, including, but not limited to:

- 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
- 7. Trump National Golf Club Washington D.C.
- 8. Trump Turnberry
- 9. Trump International Golf Links Aberdeen

The above requests includes records of both any expenditures made to the owners and operators of these properties and any expenditures to third parties in connection with activities taking place at these properties.

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 22 C.F.R. § 171.16(j), 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).

Reporting from President Donald Trump's first term and after he first left office revealed the Department of State spent substantial sums at Trump-owned properties at home and abroad. This spending includes \$234,000 at Trump's Turnberry Hotel in Scotland, almost \$60,000 at Mar-a-Lago and Trump International Golf Club in West Palm

¹ Martyn McLaughlin, Donald Trump's Turnberry firm paid £50,000 by US Government for weekend visit, The Scotsman (July 18, 2018),

https://web.archive.org/web/20180724142420/https://www.scotsman.com/news/politics/donald-trump-s-turnberry-firm-paid-50-000-by-us-government-for-weekend-visit-1-4770069.

Beach during a visit from Japan's Prime Minister,³ and more.⁴ These examples are just part of the millions of taxpayer dollars spent at Trump properties during President Trump's first administration.⁵ The requested records will illustrate how much, if any, taxpayer money is being spent at properties that the president owns and profits from, which is a matter of 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 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

³ David A. Fahrenthold, Josh Dawsey, Jonathan O'Connell & Anu Narayanswamy, Ballrooms, candles and luxury cottages: During Trump's term, millions of government and GOP dollars have flowed to his properties, The Washington Post (October 27, 2020),

https://www.washingtonpost.com/politics/ballrooms-candles-and-luxury-cottages-during-trumps-term-millions-of-government-and-gop-dollars-have-flowed-to-his-propertiesmar-a-lago-charged-the-government-3-apiece-for-glasses-of-water-for-trump-and-the-japanese-leader/2020/10/27/18 6f20a2-1469-11eb-bc10-40b25382f1be_story.html.

⁴ Linnaea Honl-Stuenkel, <u>Mike Pence's Doonbeg detour to cost nearly \$600k</u>, *Citizens for Responsibility and Ethics in Washington*, September 10, 2019,

https://www.citizensforethics.org/reports-investigations/crew-investigations/mike-pence-doonbeg-cost-nearly-600k/

Shane Savitsky, <u>State Dept. booked rooms at Trump Vancouver hotel for grand opening</u>, *Axios*, July 12, 2017.

 $[\]frac{https://www.axios.com/2017/12/15/state-dept-booked-rooms-at-trump-vancouver-hotel-for-grand-opening-1513304152$

⁵ Jordan Libowitz and Caitlin Moniz, <u>The Secret Service spent nearly \$2 million at Trump properties</u>, Citizens for Responsibility and Ethics in Washington, May 23, 2022

 $[\]underline{https://www.citizensforethics.org/reports-investigations/crew-investigations/the-secret-service-spent-nearly-2-million-at-trump-properties/}$

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 rjacobs@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 and foia@citizensforethics.org or by mail to Kira Tretiak, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

Kino Treliak

Kira Tretiak Research Intern