

September 2, 2025

EMAIL: <u>AskOGC@uscp.gov</u>

U.S. Capitol Police 119 D Street, NE Washington, DC 20510

Re: Expedited Records Request

Dear Records Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records pursuant to the disclosure policies enacted under HR 117-80 and U.S. Capitol Police's ("USCP") Public Availability of Records policy.¹

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 U.S. Capitol Police to the District of Columbia.
- 2. All records sufficient to show which units within the Capitol Police were reassigned to respond to President Trump's August 2025 deployment of officers to the District of Columbia.
- 3. All records sufficient to show the monthly budgets for the units within the Capitol Police that were reassigned to respond to President Trump's August 2025 deployment of officers to the District of Columbia.
- 4. All records sufficient to show training the Capitol Police provided to engage in the deployment within the District of Columbia.
- 5. All guidance, memoranda, final directives, policies, and other documents produced by the Capitol Police concerning its role in the deployment of officers within the District of Columbia.
- 6. All guidance, memoranda, final directives, policies, and other documents that mention, reference, or relate to the deployment of officers, 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".

¹United States Capitol Police, PUBLIC AVAILABILITY OF RECORDS: REQUESTS FOR INFORMATION https://www.uscp.gov/sites/evo-subsites/www.uscp.gov/files/documents/1.11.2024%20%20Requests% 20for%20Information%20-%20Public%20Instructions%20Final%201.11.2024.pdf.

The above request <u>excludes</u> agency records consisting <u>solely</u> 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.

Explanation of Requester's Need for Records

In accordance with USCP's Disclosure Policy, Sec. 4(b), CREW is providing an explanation of its need for the requested information. 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.² Attorney General Bondi stated that career Department of Justice staff would be involved in this effort.³ The agencies involved reportedly include the Federal Bureau of Investigation, 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.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

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

² 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.

³ Eric Katz, Trump federalizes D.C. police, says takeover will enable federal employees to work in peace, Government Executive (Aug. 11, 2025)

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

⁴ 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)

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)

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." 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." On August 16, 2025, following an emergency court hearing, the Trump administration rescinded its order replacing the MPD police chief. 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.

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.

CREW routinely disseminates information obtained through records requests 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 records requests on its website.

Expedited Processing Request

CREW also requests expedited processing for these requests on several grounds. 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 deployment of National Guard in Washington, DC. President Trump has deployed National

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.

Guard troops and federal agents from various agencies to conduct law enforcement in the nation's capital. In addition, six states have also deployed their National Guards. 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. 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 deployment. The American people, Congress and particularly residents of the District of Columbia deserve answers about the nature of the deployment, particularly as local leaders have raised alarm about implications for the District's self governance and public safety.

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 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.¹³ National Guard troops are expecting and preparing to carry weapons, further intensifying safety concerns. 14 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. 15 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 National

 $\frac{https://www.citizensforethics.org/news/analysis/dc-is-a-frequent-target-of-trumps-strongman-actions-our-democracy-could-be-collateral-damage/.\\$

¹⁰ 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/.

¹¹ See supra note 6, 7 & 8.

¹² Norton Statement After President Trump Federalizes D.C. Police and Activates D.C. National Guard (Aug. 11, 2025)

 $[\]frac{https://norton.house.gov/media/press-releases/norton-statement-after-president-trump-federalize}{s-dc-police-and-activates-dc}.$

¹³ See supra note 8.

¹⁴ Vera Bergengruen, Lara Seligman, and Micah Maidenberg, 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-i-n-washington-d-c-3965923c?st=Mq2q2F.

¹⁵ Donald Sherman, DC is a frequent target of Trump's strongman actions. Our democracy could be collateral damage. (Aug. 18, 2025)

Guard 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, ¹⁶ and to understand how federal agencies such as DOJ, DHS and DOD 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.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at lhonl-stuenkel@citizensforethics.org and lhonl-stuenkel@citizensforethics.org are the large of t

Where possible, please produce records in electronic format. Please send the requested records to lhonl-stuenkel@citizensforethics.org and foia@citizensforethics.org or by mail to Linnaea Honl-Stuenkel, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, DC 20044.

¹⁶ 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),

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.

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Sincerely,

Linnaea Honl-Stuenkel Digital Director