



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

November 12, 2025

BY EMAIL: JMaser@americorps.gov

Jana Maser
AmeriCorps' FOIA Appeals Officer
250 E Street SW
Washington, D.C. 20525

Re: FOIA Appeal – AmeriCorps FOIA Request No. 2025-62

Dear Ms. Maser:

Citizens for Responsibility and Ethics in Washington (“CREW”) submits this appeal of the Corporation for National and Community Service (“AmeriCorps”) August 13, 2025 response to the above-referenced Freedom of Information Act (“FOIA”) request. Because AmeriCorps failed to conduct an adequate search and because it incorrectly determined that it does not and need not maintain the requested records, AmeriCorps should reverse its initial determination, promptly conduct an adequate search for the requested records, and release any responsive records it identifies to CREW in full.

Background

On July 31, 2025, CREW submitted FOIA request No. 2025-62 (the “Request”) to AmeriCorps seeking:

1. Records sufficient to identify AmeriCorps' total expenditures paid to Trump National Doral in Miami, Florida,¹ its owners, or its operators in connection with the President's Volunteer Service Awards event on May 8, 2025 (the “PVSA Event”).
2. All documents regarding the attendees of the PVSA Event, including but not limited to guests lists, visitor logs, and invitations.
3. All records related to the selection of the Trump National Doral as the location for the PVSA Event.

¹ @psva_awards, Instagram (April 17, 2025),
https://www.instagram.com/p/DIjeAJ6OZNh/?img_index=2.

Attachment 1. The Request explicitly sought “responsive records regardless of format, medium, or physical characteristics,” including “paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material” as well as “correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions.” *Id.* The Request sought a fee waiver. *Id.*

On August 6, 2025, AmeriCorps acknowledged receipt of the Request and assigned it tracking number 2025-62. Attachment 2. In its response email, the AmeriCorps FOIA officer requested a 10-day extension because the officer would “need to reach out to Points of Light Foundation.” *Id.* The FOIA officer stated “They serve as the contractor to administer the President’s Volunteer Service Award program on behalf of AmeriCorps.” *Id.*

By letter dated August 13, 2025, AmeriCorps issued a final response to CREW’s FOIA request. *See* Attachment 3. This response stated “your request is denied in full. There are no responsive records.” *Id.* AmeriCorps continued to explain that the “PVSA program is administered for AmeriCorps by the Points of Light Foundation (POLF) under a memorandum of agreement. However, AmeriCorps’ response stated that POLF claims they “did not host the event . . . and would not have any details pertaining to expenditures, attendees, guest lists, visitor logs, invitations, or records related to the selection of the venue.” *Id.* AmeriCorps’ response further stated that POLF’s response also said, based on an Instagram post, it believes “the recipients listed were all submitted for PVSA awards by Luis Pina with certified organization International Academy of Chaplaincy.” *Id.* The International Academy of Chaplaincy is referred to herein as “IAC.”

CREW now timely appeals AmeriCorps’ August 13, 2025 adverse determination for failure to conduct an adequate search for the requested records. *See* 45 CFR § 2507.14(a)(5) (“A requester may appeal...[a] failure by AmeriCorps to conduct an adequate search for the requested records.”).

AmeriCorps Failed to Conduct an Adequate Search

An agency is required to conduct a FOIA search “reasonably calculated to uncover all relevant documents.” *Jimenez v. F.B.I.*, 910 F. Supp. 5, 7 (D.D.C. 1996) (quoting *Weisberg v. United States Dept. of Justice*, 705 F.2d 1344, 1350 (D.C. Cir. 1983) (quoting *Perry v. Block*, 684 F.2d 121, 128 (D.C. Cir. 1982))). An agency’s search is inadequate when there are “positive indications of overlooked materials.” *Valencia-Lucena v. U.S. Coast Guard*, 180 F.3d 321, 326 (D.C. Cir. 1999); *see also* *CREW v. GSA*, 2019 WL 3414365, at *5-6 (D.D.C. July 29, 2019) (holding that agency’s search was inadequate where it failed to uncover publicly released emails responsive to CREW’s request). Here, AmeriCorps’ determination that there are “no responsive records” to CREW’s request is refuted by (1) the agency’s failure to conduct a search of a certified organization known to be involved with the PVSA Event, and (2) legal requirements that obligate federal contractors to retain records. These “positive indications of overlooked materials” confirm that AmeriCorps has failed to conduct an adequate search. *Valencia-Lucena*, 180 F.3d at 326.

(1) Failure to Adequately Search Internal Records or Contact Known Third-Party Organization

AmeriCorps has not met its burden of proving that there are “no responsive records” to the Request. In responses to CREW, AmeriCorps twice confirmed that POLF administers the PVSA program “on behalf of AmeriCorps.” See Attachments 2 and 3. AmeriCorps stated that the program is administered under a Memorandum of Agreement and referred to POLF as “the contractor” that administers the program. Attachment 2; Attachment 3. Official Office of Management and Budget documentation further confirms that “[t]he President's Volunteer Service Award program is [a] [sic] partnership between CNCS [AmeriCorps] and the Points of Light Foundation.” OMB Form 3045-0086. And the government website FAQ page that describes the PVSA program still states that “[a]ny questions about an existing PVSA order can be sent to support@pointsoflight.org,” indicating that POLF continues “to administer the [PVSA] program on behalf of AmeriCorps.”² Yet, AmeriCorps has failed to produce any evidence of this Memorandum of Agreement nor any other records or communications pertaining to AmeriCorps’ relationship with POLF, including whether OMB Form 3045-0086 is no longer operational. Outreach to POLF, without more, does not prove that its search was “reasonably calculated to uncover all relevant documents.” *Valencia-Lucena*, 180 F.3d at 325.

Furthermore, AmeriCorps’ response indicates that AmeriCorps, the agency for whom the PVSA program is administered, is apparently unaware of its own government contracts and agreements as it pertains to the PVSA program. In responding to CREW’s request, AmeriCorps has taken POLF at its word that it is no longer responsible for administering the program. POLF merely revealed that the “recipients listed were all submitted for PVSA awards by Luis Pina with certified organization International Academy of Chaplaincy.” See Attachment 3. But this does not indicate that IAC actually administered the event. Rather, a certifying organization:

“is an organization that has been granted authority through an application and review process to give out the PVSA to volunteers. Certifying Organizations verify and certify that a volunteer has met the requirements to receive a PVSA within a 12 month period specified by the Certifying Organization. Only Certifying Organizations can certify volunteers’ eligibility for the PVSA and order awards.”³

Certifying organizations, in other words, are the organizations that certify volunteers as being eligible to receive the PVSA award, including by tracking hours, verifying eligibility, and establishing procedures for compliance. Certifying organizations are not responsible for organizing events like the one held at Trump National Doral on May 8, 2025. AmeriCorps’ own failure to conduct a search of its internal records and contractor agreements to determine the true host of the PVSA Event indicates that AmeriCorps did not complete an adequate search of its records as required by FOIA, for the agency itself lacks clarity on who orchestrated the event in its own name.

² AmeriCorps, Frequently Asked Questions <https://presidentialserviceawards.gov/>.

³ The President's Volunteer Service Award, Eligibility Requirements, (Jan. 2, 2025), https://www.jbsa.mil/Portals/102/Documents/MFRC%20Calendars/2025%20PVSA%20Eligibility%20Criteria.pdf?ver=glRc3mEnZdmk36_anD4KjA%3D%3D.

Finally, POLF provided AmeriCorps with an email and mailing address associated with Mr. Pina and the IAC. See Attachment 3. At the very least, AmeriCorps has an obligation under FOIA to conduct a search of its records for evidence of records received from Mr. Pina and IAC, including any applications or agreements. It could have used this information to determine who organized the PVSA Awards event and how the decision to hold the event at a Trump property was made. AmeriCorps' response to the Request provides no indication that AmeriCorps conducted such a search or contacted—or even attempted to contact—IAC or Mr. Pina. See *Valencia-Lucena*, 180 F.3d at 325 (D.C. Cir. 1999) (holding that agencies have an obligation “to follow through on obvious leads to discover requested documents”); *Nat'l Day Laborer Org. Network v. U.S. Immigr. & Customs Enf't Agency*, 877 F. Supp. 2d 87, 97 (S.D.N.Y. 2012) (indicating that failure to conduct a search of records of “outside contractors” or to provide evidence that “outside contractors were included in [an agency's] search” “makes it impossible for [the Court] to determine whether an adequate search of those contractors' records was conducted”). AmeriCorps' failure to request that IAC provide the agency with records relating to the PVSA Event, despite an Instagram post corroborating IAC's involvement, is yet another “indication of overlooked materials.” *Valencia-Lucena*, 180 F.3d at 326.

(2) Federal Regulations Requiring Contractor Records Retention

AmeriCorps' explanation that there are “no responsive records” to the Request contradicts common sense and federal contractors' obligations to maintain the precise records sought by the Request. Federal law requires contractors to document and maintain records of spending in the course of fulfilling their contract obligations. As a contractor of AmeriCorps, POLF, or any equivalent contractor who organized the event, is subject to these regulations.

First, there are clearly, “positive indications of overlooked materials” in this case. *Valencia-Lucena*, 180 F.3d at 326. Even taking POLF at its word that it did not administer the PVSA awards this year, the awards ceremony did take place. The Instagram account @psva_awards presents numerous images of individuals receiving PVSA awards, with the location in each image marked as “Doral Miami Florida.” See generally @psva_awards, Instagram. As such, *some party*, whether it is POLF, AmeriCorps, IAC, or another contractor or third party, did organize the event, procure space at Doral Miami, invite attendees, coordinate with vendors, and so forth. AmeriCorps, as the agency responsible for the PVSA awards, must have some record of this event. FOIA obligates AmeriCorps to make these records public.

Furthermore, the contractor who organized the PVSA Event must have records of its involvement and these records are subject to FOIA. The Federal Acquisition Regulation (“FAR”) outlines record retention requirements for federal contractors. FAR provides that “contractors shall make available records” including “documents, accounting procedures and practices, and other data” to satisfy “administration” and “audit requirements of the contracting agencies and the Comptroller General” for three years after final payment of the contract. FAR 4.703. Certain financial and cost accounting records must be retained for four years, including accounts receivable invoices, checks, and vendor invoices. See FAR 4.705-1(a), (d), and (e). The regulations also provide that “[a] contractor is responsible for accounting for costs appropriately and for maintaining records, including supporting

documentation, adequate to demonstrate that costs claimed have been incurred, are allocable to the contract, and comply with applicable cost principles in this subpart and agency supplements." FAR 31.201-2(d).

AmeriCorps' response to CREW's FOIA request states that "[t]he PVSA program is administered *for* AmeriCorps by [POLF] under a memorandum of agreement." Attachment 3 (emphasis added). It is therefore irrelevant that POLF "did not host the event." *Id.* POLF is required to both "make available" and "maintain[]" the records sought by CREW as the sole administrator of the PVSA program. The organization's claim that it "would not have any details pertaining" to CREW's request, and its resultant failure to produce records, is yet another indication AmeriCorps did not conduct an adequate search that was "reasonably calculated to uncover all relevant documents." *Jimenez*, 910 F. Supp. at 7.

(3) Need for PVSA Transparency

Finally, public understanding of the PVSA program, AmeriCorps' compliance with federal law and regulations, and its relationship with third-party contractors is especially needed at this time, as AmeriCorps has apparently shut down the PVSA program without public notice or opportunity for public comment. According to the official PVSA website:

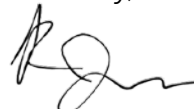
The President's Volunteer Service Award is on a temporary pause, as decided by AmeriCorps effective May 27, 2025. At this time, orders for awards and applications to become a Certifying Organization are not being accepted.⁴

The website also states that AmeriCorps "do[es] not have a date for when the program will resume," that "PVSA orders cannot be placed until regular operations resume," and that "Certifying Organizations cannot access their accounts while the program is paused." *Id.* Given the lack of transparency about AmeriCorps' decision to shut down this important program, a fulsome response to CREW's request is gravely needed at this time.

Conclusion

For the foregoing reasons, AmeriCorps should reverse its August 13, 2025 determination and release the requested records in full to CREW. Please direct any communications about this appeal to me at [REDACTED].

Sincerely,



Rebecca Jacobs
Research Manager

⁴ <https://presidentialserviceawards.gov/>.

November 12, 2025

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Attachments:

1. CREW's July 31, 2025 FOIA Request
2. AmeriCorps' August 6, 2025 Acknowledgment of Receipt
3. AmeriCorps' August 13, 2025 Response

Attachment 1



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

July 31, 2025

BY EMAIL: foia@americorps.gov

Jana Maser
Chief FOIA Officer and FOIA Appeals Officer
AmeriCorps
Office of the General Counsel
Attn: Freedom of Information Act Officer
250 E Street, SW
Washington, DC 20525

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 AmeriCorps regulations.

Specifically, CREW requests:

1. Records sufficient to identify AmeriCorps’ total expenditures paid to Trump National Doral in Miami, Florida,¹ its owners, or its operators in connection with the President’s Volunteer Service Awards event on May 8, 2025 (the “PVSA Event”).
2. All documents regarding the attendees of the PVSA Event, including but not limited to guests lists, visitor logs, and invitations.
3. All records related to the selection of the Trump National Doral as the location for the PSVA Event.

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,

¹ @psva_awards, Instagram (April 17, 2025), https://www.instagram.com/p/DIjeAJ6OZNh/?img_index=2

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 45 C.F.R. § 2507.24, 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).

By way of background, on May 8, 2025, AmeriCorps held the President's Volunteer Service Awards Hispanic Honor Edition at Trump National Doral in Miami.² The President's Volunteer Service Award, bestowed by AmeriCorps, recognizes the contribution of individuals or groups who perform a certain amount of community or public service hours within a 12-month period.³ Tickets for the General Admission Gala and Nomination Gala during the event were sold for \$195 and \$175,⁴ respectively, but the events' total cost to the taxpayer and the portion of that cost paid by AmeriCorps are unclear. Further, the event was held at the for-profit Trump National Doral just days after the Trump Administration's April 25, 2025 announcement that it would be terminating nearly \$400 million in grants awarded by AmeriCorps to pursue its mission.⁵ Following the event, on May 27, 2025, further awards of the President's Volunteer Service Award were suspended, with no date for resuming

² *Id.*

³ AmeriCorps, *Awards and Recognition*, <https://www.americorps.gov/partner/partnerships/awards>

⁴ Zeffy, *President's Volunteer Service Award (PVSA) Gala*, <https://www.zeffy.com/en-US/ticketing/presidents-volunteer-service-award-pvsa-gala>

⁵ Jennifer Ludden, *Trump's gutting of AmeriCorps hits hard, for both volunteers and communities*, NPR (May 9, 2025), <https://www.npr.org/2025/05/09/nx-s1-5383188/trumps-gutting-of-americorps-hits-hard-for-both-volunteers-and-communities>

program operations.⁶ The requested records will provide clarity on the cost of the event, along with information about event attendees and the decision to hold an AmeriCorps event at a Trump property, all of which will help the general public understand AmeriCorps' spending priorities and potential conflicts of interest, as it apparently spends taxpayer money at properties owned by the President while at the same time suspending hundreds of millions of dollars in grants meant to benefit the American public.

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 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 [REDACTED] and foia@citizensforethics.org or call me at [REDACTED]. 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 [REDACTED] and foia@citizensforethics.org or by mail to Zoe Kramer, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

⁶ Presidential Service Awards, <https://presidentialserviceawards.gov/>

Sincerely,

A handwritten signature in black ink that reads "Zoe Kramer". The signature is written in a cursive, flowing style.

Zoe Kramer
Research Intern

Attachment 2



Alert CREW <alerts@citizensforethics.org>

Freedom of Information Act Request

Freedom of Information <FOIA@americorps.gov>

Wed, Aug 6, 2025 at 3:42 PM

To: Rebecca Jacobs [REDACTED]

Cc: CREW FOIA <foia@citizensforethics.org>, Zoe Kramer [REDACTED] Freedom of Information <FOIA@americorps.gov>

Dear Ms. Jacobs,

I'm writing to confirm that AmeriCorps has received your FOIA request. The assigned tracking number 2025-62.

We expect to need an additional 10 days to process the request, as we'll need to reach out to Points of Light Foundation. They serve as the contractor to administer the President's Volunteer Service Award program on behalf of AmeriCorps.

Sincerely,

Stephanie Soper**Law Office Manager & FOIA Officer**

Office of General Counsel

www.americorps.gov

(202) 606-6747



From: Rebecca Jacobs [REDACTED]**Sent:** Thursday, July 31, 2025 12:10 PM**To:** Freedom of Information <FOIA@americorps.gov>**Cc:** CREW FOIA <foia@citizensforethics.org>; Zoe Kramer [REDACTED]**Subject:** [External] Freedom of Information Act Request

You don't often get email from rjacobs@citizensforethics.org. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

8/7/25, 2:46 PM

Citizens for Responsibility and Ethics in Washington Mail - Freedom of Information Act Request

[Quoted text hidden]

Attachment 3

August 13, 2025

Rebecca Jacobs, Research Manager
Zoe Kramer, Research Intern
Citizens for Responsibility and Ethics in Washington
P.O. Box 14596
Washington, DC 20044

Via email: [REDACTED]
foia@citizensforethics.org

Re: Freedom of Information Act Request 2025-62

Dear Ms. Jacobs and Ms. Kramer:

I am writing with the response to your Freedom of Information Act (FOIA) request that the Corporation for National and Community Service (operating as AmeriCorps) received from you on July 31, 2025. We understand the scope of your request to be:

Records sufficient to identify AmeriCorps' total expenditures paid to Trump National Doral in Miami, Florida, its owners, or its operators in connection with the President's Volunteer Service Awards event on May 8, 2025 (the "PVSA Event").

2. All documents regarding the attendees of the PVSA Event, including but not limited to guests lists, visitor logs, and invitations.

3. All records related to the selection of the Trump National Doral as the location for the PSVA Event.

Your request is denied in full. There are no responsive records.

The PVSA program is administered for AmeriCorps by the Points of Light Foundation (POLF) under a memorandum of agreement. We contacted POLF to ask for all responsive records per your request, and they responded that they *"did not host the event...and would not have any details pertaining to expenditures, attendees, guest lists, visitor logs, invitations, or records related to the selection of the venue."*

POLF's response also said that:

...based on what [they] found on [this page](#) [an Instagram account] about the event, the recipients listed were all submitted for PVSA awards by Luis Pina with certified organization International Academy of Chaplaincy.



Here are the details we have on Mr. Pina and the International Academy of Chaplaincy:

lpina@aiccapellania.com

14574 SW 208th Street. Apt. 101

Homestead, FL 33032

There is no fee for this response.

If you are dissatisfied with my action on this request, you may appeal by writing, within 90 days of receipt of this letter, to Jana Maser, AmeriCorps' FOIA Appeals Officer, at the address on the letterhead for this response. Alternatively, you may contact Ms. Maser by email at JMaser@americorps.gov.

Additionally, the Office of Government Information Services (OGIS) offers mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS does not affect your right to pursue litigation. You may contact OGIS in any of the following ways:

Office of Government Information Services
National Archives and Records Administration
Room 2510
8601 Adelphi Road
College Park, MD 20740-6001
Email: ogis@nara.gov
Telephone: (301) 837-1996
Facsimile: (301) 837-0348
Toll-free: 1-877-684-6448

You may also contact me at foia@americorps.gov. AmeriCorps' FOIA Public Liaison is Kiara Rhodes: KRhodes@americorps.gov.

Sincerely,

Stephanie Soper
FOIA Officer
Law Office Manager