



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

November 25, 2025

FOIA Officer
Council of the Inspectors General on Integrity and Efficiency
1750 H Street NW, Suite 400
Washington DC 20006

Email: foiastaff@cigie.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) submits this request for records to the Council of the Inspectors General on Integrity and Efficiency (“CIGIE” or “the Council”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and CIGIE regulations, 5 C.F.R. § 9800 *et seq.*

Specifically, CREW requests the following records:

- From October 1, 2022 to the date this request is processed, all communications and summaries of communications with any member of Congress, staff member, or committee staff regarding the Office of Management and Budget’s (“OMB”) apportionment of amounts for the Inspector General Council Fund, including any notification under section 749 of the Further Consolidated Appropriations Act, 2024 (Pub. L. No. 118-47), or any similar provision in prior or subsequent appropriations acts.
- From September 10, 2025 to the date this request is processed:
 - All notices provided to CIGIE personnel regarding OMB’s decision to not apportion funds for fiscal year 2026, described in Acting Chair Hull’s September 27, 2025 letter to Congress (the “OMB Decision”);¹
 - All notices provided to CIGIE members regarding the OMB Decision, including the decision’s actual or potential impact on CIGIE’s work or operations, and any responses to them;
 - All notices provided to Integrity Committee (“IC”) members or their designees, the Allegation Review Group, the IC Working Group, or any Assisting Inspector General undertaking an investigation for the IC regarding the OMB

¹ Available at

<https://www.documentcloud.org/documents/26173184-cigie-letter-to-congress-september-27-2025/>.

- Decision, including the decision's actual or potential impact on CIGIE's work or operations,² and any responses to them;
- All notices provided to CIGIE contractors regarding the OMB Decision, and any responses to them; and
 - All communications with OMB regarding the OMB Decision.
 - From November 14, 2025 to the date this request is processed:
 - All notices provided to CIGIE personnel regarding OMB's apportionment of funds to the Inspectors General Council Fund on November 18, 2025 (the "November 18 Apportionment"³);
 - All directives and guidance provided to CIGIE personnel regarding the use of funds pursuant to the November 18 Apportionment, including those reflecting changes or limitations to the scope of CIGIE's work or the suspension of work being conducted by CIGIE prior to October 1, 2025;
 - All notices provided to CIGIE members regarding the November 18 Apportionment, including changes or limitations to the scope of CIGIE's work or the suspension of work being conducted by CIGIE prior to October 1, 2025 as a result of the November 18 apportionment, and any responses to them;
 - All notices provided to IC members or their designees, the Allegation Review Group, the IC Working Group, or any Assisting Inspector General undertaking an investigation for the IC regarding the November 18 apportionment, including changes or limitations to the scope of CIGIE's work or the suspension of work being conducted by CIGIE prior to October 1, 2025 as a result of the November 18 Apportionment, and any responses to them;
 - All notices provided to CIGIE contractors regarding the November 18 apportionment.
 - All communications with OMB regarding the November 18 Apportionment.
 - From fiscal year 2016 through fiscal year 2026:
 - All requests for apportionment made by CIGIE under OMB Circular A-11 § 120 and 31 U.S.C. § 1513(b); and
 - All account-specific apportionments approved for any account associated with CIGIE under 31 U.S.C. §§ 1512, 1513(b).
 - For fiscal year 2026, all documents submitted and communications sent to OMB regarding CIGIE's congressional budget justification or detailing, explaining, or summarizing past or planned expenditures.
 - CIGIE's current staff organizational chart.
 - From October 1, 2024 to the date this request is processed, all communications and summaries of communications with Congress regarding the Inspector General

² See, e.g., CIGIE, *Integrity Committee Policies and Procedures 2018* (Apr. 13, 2018), https://www.ignet.gov/sites/default/files/files/ICP%26PRevised_Jan-2018_Rev1_Finalx.pdf.

³ Available at https://apportionment-public.max.gov/Fiscal%20Year%202026/Other%20Independent%20Agencies/Excel/FY2026_Agency%3DCIGIE_Bureau%3DCIGIE_TAFS%3D542-X-4592_Iteration%3D1_2025-11-18-09.57.xlsx; also available at <https://openomb.org/file/11483369>.

Council Fund, including any spend plan submitted to any congressional committee or member of Congress.

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).

Congress established CIGIE as an independent agency to “address integrity, economy, and effectiveness issues that transcend individual Government agencies.”⁴ To execute its mission of promoting accountability in the OIG community, CIGIE carries out numerous statutorily required functions and duties.⁵ These include operating Oversight.gov⁶; running academies to developing a well-trained, highly skilled OIG workforce⁷; and administering a committee to “receive, review, and refer” allegations of

⁴ 5 U.S.C. § 424(a)(2).

⁵ See generally *id.* § 424.

⁶ *Id.* § 424(e)(2).

⁷ *Id.* § 424(c)(1)(E).

wrongdoing made against Inspectors General, designated senior members of OIGs, and the Special Counsel and Deputy Special Counsel of the Office of Special Counsel.⁸

CIGIE is primarily funded through assessments from member OIGs.⁹ These funds are transferred into a revolving fund, which “provides resources for all CIGIE activities.”¹⁰ CIGIE also receives fees and tuition payments through its Training Institute, which are placed in the revolving fund.¹¹ By statute, once transferred to the revolving fund, funds remain available to CIGIE without fiscal year limitation, and thus are “no-year funds” that do not expire at the end of the fiscal year.¹² Congress also has appropriated no-year funds to CIGIE for enhancements to Oversight.gov.¹³ In total, at the end of fiscal year 2025 CIGIE had over \$29 million dollars in unobligated no-year funds in its revolving fund.¹⁴

Despite this available funding, on September 26, 2025, OMB “informed [CIGIE] in a call that they had made a policy decision that CIGIE would not receive an apportionment of funding for Fiscal Year (FY) 2026.”¹⁵ Because an agency cannot spend more than OMB apportions, OMB’s decision led to the effective shutdown of CIGIE, notwithstanding the availability of millions of dollars in appropriated amounts.¹⁶ CIGIE was forced to stop performing its statutory functions and had to furlough 25 permanent employees. On November 18, 2025, OMB apportioned just under \$4.3 million for CIGIE so that it may continue to operate through January 30, 2026 while OMB also conducts a “programmatic review” of the Council.¹⁷ The apportioned funds are available only “for salaries and expenses or to make payments otherwise required by law.”¹⁸

Neither OMB nor CIGIE has provided meaningful information regarding OMB’s refusal to apportion funds to CIGIE, its decision to now provide partial funding, how OMB’s

⁸ *Id.* § 424(d)(1).

⁹ Congressional Budget Justification, Fiscal Year 2026, at 8 (last visited Nov. 24, 2025), <https://www.ignet.gov/sites/default/files/files/CIGIE%20FY%202026%20Congressional%20Justification.pdf>.

¹⁰ *Id.* at 9.

¹¹ 5 U.S.C. §§ 424(c)(3)(A)(i)(I), (B)(ii).

¹² *Id.* § 424(c)(3)(B)(iv).

¹³ *See, e.g.*, Consolidated Appropriations Act, 2019, Pub. L. No. 116-6, div. E, title VI, § 633, 133 Stat. 13, 186 (2019).

¹⁴ *See* SF-133, CIGIE, Fiscal Year 2025, available at https://portal.max.gov/portal/document/SF133/Budget/attachments/2580777874/FY2025_SF133_MONTHLY_Other_Independent_Agencies.xlsx. Congress also recently appropriated no-year funding “to further develop the data analytics capabilities of [CIGIE’s Pandemic Response Accountability Committee] to enhance transparency and to prevent, detect, and remediate waste, fraud, and abuse in Federal spending.” *See, e.g.*, Further Consolidated Appropriations Act, 2024, Pub. L. No. 118-47, div. B, title VI, § 629, 138 Stat. 460, 571 (2024).

¹⁵ Letter from Council of the Inspectors General on Integrity and Efficiency to Congress, (Sept. 27, 2025) <https://www.documentcloud.org/documents/26173184-cigie-letter-to-congress-september-27-2025/>.

¹⁶ *See* 31 U.S.C. §§ 1517–19.

¹⁷ *See* Sen. Chuck Grassley & Sen. Susan Collins, *OMB Releases Nearly \$4.3 Million for CIGIE Following Push by Grassley, Collins*, U.S. Senate Comm. on the Judiciary (Nov. 18, 2025), <https://www.judiciary.senate.gov/press/rep/releases/omb-releases-nearly-43-million-for-cigie-following-push-by-grassley-collins>.

¹⁸ *See supra* note 3.

conduct has influenced CIGIE's operations, or the "programmatic review" OMB allegedly is undertaking. An OMB spokesperson told CBS News in a statement that: "Inspectors general are meant to be impartial watchdogs identifying waste and corruption on behalf of the American people[.] Unfortunately, they have become corrupt, partisan, and in some cases, have lied to the public. The American people will no longer be funding this corruption."¹⁹ But OMB has not provided any further information regarding those allegations, why OMB has decided to now partially fund CIGIE, or how it will make any future funding decisions for the Council. Further, OMB has limited CIGIE's use of funds apportioned to CIGIE to paying salaries and expenses or making payments required by law. Based on the scant public record, the public also cannot meaningfully ascertain, among other things, the extent to which OMB's refusal to fully fund CIGIE has and continues to impact CIGIE's work, or how OMB's partial apportionment compares to CIGIE's apportionment requests.

The records CREW seeks would shed light on these issues and inform the public of both OMB's conduct and the implications it has on CIGIE's work. The public has a vital interest in understanding these issues, which implicate the extent and propriety of OMB's refusal to fund CIGIE for the entire fiscal year and CIGIE's ability to fulfill its important role in promoting an efficient and ethical government. This is true in any circumstance, but particularly here, where OMB still refuses to fund CIGIE beyond January 30, allegedly is conducting a "programmatic review" of CIGIE's operations, and has further constrained the purposes for which CIGIE can use its congressionally appropriated funds.²⁰

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 hundreds of thousands of 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

¹⁹ Scott MacFarlane, *Trump administration to defund federal watchdog council*, CBS News (Oct. 1, 2025, at 12:41 PM), <https://www.cbsnews.com/news/trump-defunding-council-of-inspectors-general/>.

²⁰ 31 U.S.C. § 1513(b); Exec. Order No. 6,166 (June 10, 1933), as amended by Exec. Order No. 12,608, 52 Fed. Reg. 34617 (Sept. 9, 1987).

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.

Request for Expedition

CREW requests expedited processing of this request, pursuant to 5 U.S.C. § 552 and 5 C.F.R. § 9800.104(e). CREW is entitled to expedited processing because (1) there is “[a]n urgency to inform the public about an actual or alleged Federal Government activity” and CREW is “primarily engaged in disseminating information,” 5 C.F.R. § 9800.104(e)(1)(ii), and (2) these 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.” *Id.* at § 9800.104(e)(1)(iv).

- (1) First, the same facts that justify a fee waiver mandate an expedited response to this request because they demonstrate a particularly urgent need to inform the public about OMB’s decision to withhold appropriated funds for CIGIE and the consequences of OMB’s conduct on CIGIE’s operations and effectiveness. OMB’s decision to unilaterally prevent CIGIE from accessing congressionally appropriated funds disrupted numerous important oversight functions, including the Oversight.gov website, whistleblower reporting portals, and activities designed to ensure the inspectors general community is held accountable. The public has virtually no information regarding the reasons for that disruption or the extent to which OMB’s temporary and partial funding decision is disrupting CIGIE’s functions.

Additionally, these disruptions to CIGIE’s funding have occurred within the broader context of the current administration’s efforts to disrupt federal oversight. Since January 2025, the administration has fired more than a dozen Senate-confirmed Inspectors General.²¹ Those removals did not follow the lawful process outlined for such removal.²² The terminations, along with other IG departures, have left dozens of IG offices without Senate-confirmed leadership.²³ While the administration has recently nominated a handful of new IGs, their impartiality is the subject of serious inquiry by Congressional leaders.²⁴ IG offices have been directed to undertake large staffing

²¹ Chris Piper, *President Trump’s firing of inspectors general threatens government accountability and efficiency*, Partnership for Public Service (Oct. 21, 2025), <https://ourpublicservice.org/blog/president-trumps-firing-of-inspectors-general-threatens-government-accountability-and-efficiency/>.

²² See 5 U.S.C. § 403(b); see also *id.* (“Federal law requires that presidents provide Congress with advanced notice and a substantive rationale prior to removing an inspector general. Trump did not provide Congress with the necessary notice or rationale...”).

²³ Piper, *supra* note 21; *Inspector General Vacancies*, Oversight.gov (last visited Nov. 25, 2025), <https://www.oversight.gov/about/inspectors-general-vacancies>.

²⁴ See Sean Michael Newhouse, *Senate Democrats grill inspector general nominees over their independence from Trump*, Government Executive (Oct. 23, 2025),

reductions,²⁵ and in February 2025, President Trump removed the Director of the Office of Government Ethics²⁶ and the head of the Office of Special Counsel.²⁷ OMB has also publicly directed agencies not to cooperate with the Government Accountability Office, which is Congress's watchdog.²⁸ These actions have an effect—chilling potential whistleblower activities, and potentially making IGs hesitant to perform their statutory duties.

Further, as explained above, CREW is “primarily engaged in disseminating information” to the public. CREW’s primary purpose is to inform and educate the public about the activities of government officials and agencies. To that end, CREW uses statutes like FOIA to gather information the public needs to hold public officials accountable and disseminates this information through social media and its website, www.citizensforethics.org, which receives tens of thousands of views every month.²⁹

Finally, CIGIE’s appropriation structure, as well as OMB’s decision to withhold CIGIE funds, concerns quintessential federal government activity.

- (2) The same alleged facts raise possible questions, in “[a] matter of widespread and exceptional media interest involving questions about the Government’s integrity which affect public confidence.” 5 C.F.R. § 9800.104(e)(1)(iv). Despite recent news coverage,³⁰ it remains unclear why OMB withheld more than \$29

<https://www.govexec.com/oversight/2025/10/senate-democrats-grill-inspector-general-nominees-over-their-independence-trump/409019/>.

²⁵ See Letter from Democrats on the House Oversight and Reform Committee to Secretary of Homeland Security Kristi Noem (Aug. 15, 2025),

<https://oversightdemocrats.house.gov/sites/evo-subsites/democrats-oversight.house.gov/files/evo-media-document/2025-08-15.garcia-et-al-to-24-cfo-act-agencies-re-oigs.pdf>.

²⁶ Myah Ward, *Trump removes Government Ethics Office director*, POLITICO (Feb. 7, 2025 at 4:12 PM), <https://www.politico.com/news/2025/02/10/trump-removes-government-ethics-office-director-00203418>.

²⁷ Sean Michael Newhouse, *Ethics and whistleblower officials fired by Trump*, Government Executive (Feb. 11, 2025 at 10:30 AM), <https://www.govexec.com/management/2025/02/ethics-and-whistleblower-officials-fired-trump/402887/>.

²⁸ See, e.g., Chris Marquette, *White House directs DOT to ignore GAO ruling on EV funding pause*, POLITICO (Jun. 4, 2025 at 6:19 AM), <https://www.politico.com/news/2025/06/04/white-house-dot-gao-ev-funding-00384230>.

²⁹ See, e.g., *Citizens for Responsibility and Ethics in Washington*, N.Y. Times, <https://www.nytimes.com/topic/citizens-for-responsibility-and-ethics-in-washington> (last visited Nov. 20, 2024) (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”).

³⁰ See e.g. MacFarlane, *supra* note 19; Terry Gerton, *A watchdog that helps root out federal waste is facing its own shutdown*, Federal News Network (Oct. 6, 2025 at 2:38 PM), <https://federalnewsnetwork.com/agency-oversight/2025/10/a-watchdog-that-helps-root-out-federal-waste-is-facing-its-own-shutdown/>; Max Rego, *Collins, Grassley call on White House budget office to unfreeze oversight funding*, The Hill (Sept. 20, 2025 at 6:49 PM),

million dollars in unobligated no-year funds for CIGIE. The decision is contextualized by the administration's firing of more than a dozen Senate-confirmed IGs, proposed budget cuts, and reduced IG office staffing. The lack of public information regarding OMB's actions, which significantly compromises CIGIE's ability to conduct critical oversight functions, raises significant possible questions of widespread and exceptional public interest regarding the integrity of the federal government.

For all these reasons, CREW satisfies the requirements for expedition. 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 cwentworth@citizensforethics.org and foia@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 cwentworth@citizensforethics.org and foia@citizensforethics.org or by mail to Christie Wentworth, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, D.C. 20004.

Sincerely,



Christie Wentworth

<https://thehill.com/homenews/5529885-grassley-collins-funding-inspectors-general-omb/>; Meryl Kornfield, *Trump administration moves to defund inspector general watchdog group*, The Washington Post (Sept. 30, 2025), <https://www.washingtonpost.com/politics/2025/09/30/inspector-general-watchdog-cuts-trump/>; Kevin Bogardus, *Trump faces GOP pushback over axing watchdog group*, E&E News by POLITICO (Sept. 30, 2025 at 1:43 PM), <https://subscriber.politicopro.com/article/eenews/2025/09/30/trump-faces-gop-pushback-over-axing-watchdog-group-00587994>; Courtney Bubl , *Federal Watchdog Funds Released After Bipartisan Pushback*, Law360 (Nov. 18, 2025 at 4:24 PM), <https://www.law360.com/articles/2412716>.