

December 9, 2025

Submitted via email: EFOIA@uscg.mil

Commandant (CG-C5I-P2) Attn. FOIA Officer US Coast Guard Stop 7710 2703 Martin Luther King Jr. Ave. S.E. Washington, DC 20593-7710

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 Homeland Security ("DHS") regulations.

Specifically, from January 1, 2020 to the date this request is processed, CREW requests the following:

- 1. Documents sufficient to identify what officers or components of the U.S. Coast Guard or private contractors are responsible for operating the Coast Guard Exchanges stores in Washington, D.C. and Centreville, Virginia.
 - a. Examples of responsive documents may include: manuals, standard operating procedures, directives, agreements, contracts, or organizational charts.
- 2. All documents referencing Trump-branded alcoholic beverages, including references to:
 - a. Trump Wine or Winery;
 - b. Trump Cider or Cidery;
 - c. The Trump Organization;
 - d. Donald J. Trump Revocable Trust; or
 - e. Eric Trump Wine Manufacturing LLC.
- 3. All communications between the Coast Guard and Trump-owned businesses, including Trump Winery.
- 4. Documents sufficient to identify the gross revenue generated from Trump-branded alcoholic beverages sold at Coast Guard Exchanges.

a. Examples of responsive documents may include point-of-sale (POS) system reports; inventory management records; financial and accounting statements; vendor/supplier invoices and contracts; or merchandising and procurement documents.

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).

According to recent reporting, Coast Guard Exchanges at the Coast Guard's headquarters in Washington, D.C. and in Centreville, Virginia recently stocked and sold Trump-branded wine and cider for sale to federal employees. Assistant Secretary of Homeland Security Tricia McLaughlin reportedly confirmed their availability, telling Forbes,

¹ See Zach Everson, *Trump Wine Hits Government Shelves*, Forbes (Nov. 7, 2025 at 6:30 PM), https://www.forbes.com/sites/zacheverson/2025/11/06/trump-wine-coast-guard-exchanges-stores-federal-property-government/; see also Joe Sommerlad, *Military members offered Trump wine as First Family's latest cash grab hits shelves*, The Independent (Nov. 7, 2025 at 5:18 PM), https://www.independent.co.uk/news/world/americas/us-politics/trump-wine-cider-coast-guard-exchanges-b2860989.html.

"The brave men and women of USCG are pleased to be able to buy Trump wine and cider tax free." Neither the White House, the Coast Guard, nor DHS have responded to requests for comment.

According to President Trump's latest financial disclosures, Donald J. Trump Revocable Trust owns 100% of the winery's land and an LLC holding wine-related trademarks. President Trump is the sole donor and beneficiary of the trust, while his son Donald Trump Jr. serves as the trustee. President Trump may earn income from the businesses administered by the trust while in office.

President Trump's income from sales of Trump Wine and Cider at Coast Guard exchanges may violate the Constitution's Domestic Emoluments Clause. The Domestic Emoluments Clause prevents the president from receiving under any circumstances profits, gains or advantages from the federal government itself, outside of his or her government salary and benefits, or from the individual states. The framers of our Constitution drafted the clause broadly, because they were concerned about the many ways a president's loyalty could be compromised by his or her personal financial interest.

It remains unclear why the Coast Guard Exchanges decided to sell Trump-branded wine and cider. The requested records will shed light on the nature of these sales and to what extent President Trump, Donald J. Trump Revocable Trust, Trump Winery, or any other Trump-related business benefitted from the sale of Trump-branded beverages at the Coast Guard Exchanges in potential violation of the Constitution's ban on the president profiting from the United States government beyond the compensation provided for in the Constitution.

CREW is a nonprofit 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 and to ensuring the integrity of the federal government. 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").

² Everson, *supra* note 1.

³ *Id*.

⁴ Id.

⁵ *Id*.

⁶ *Id*.

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 a foia@citizensforethics.org or call me at a large and a

Where possible, please produce records in electronic format. Please send the requested records to and <u>foia@citizensforethics.org</u> or by mail to Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, D.C. 20004.

Sincerely,

/s/ Kayvan Farchadi