



December 22, 2025

Submitted via email: foia@hq.dhs.gov

Roman Jankowski
Chief FOIA Officer
Privacy Office, Mail Stop 0655
Department of Homeland Security
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065

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, CREW requests:

1. Records sufficient to show the DHS’s formal or informal policies regarding the payment, enabling, or facilitation of emoluments to the President of the United States.
2. All communications referencing the DHS’s formal or informal policies regarding the payment, enabling, or facilitation of emoluments to the President of the United States.
3. Records sufficient to show the DHS’s formal or informal policies regarding transactions with businesses owned or controlled by the President of the United States.
4. All communications referencing the DHS’s formal or informal policies regarding transactions with businesses owned or controlled by the President of the United States.
5. Records sufficient to show the DHS’s procedures for documenting transactions with businesses owned or controlled by the President of the United States.

6. All communications referencing the DHS's procedures for documenting transactions with businesses owned or controlled by the President of the United States.
7. All records documenting negotiations, agreements, or transactions between the DHS and businesses owned or controlled by President Donald Trump.

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); accord 6 C.F.R. § 5.11(k)(1)*. 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).

After President Trump began his second term in January, his net worth increased by an estimated \$3 billion dollars, reportedly peaking at \$7.3 billion in September.¹ Several

¹ Dan Alexander, *Presidency Boosts Trump's Net Worth By \$3 Billion In A Year*, Forbes (Sept. 9, 2025 at 6:00 AM), <https://www.forbes.com/sites/danalexander/2025/09/09/presidency-boosts-trumps-net-worth-by-3-billion-in-a-year/>; David D. Kirkpatrick, *The Number: How Much is Trump Pocketing Off the Presidency?*, New Yorker (Aug. 11, 2025), <https://www.newyorker.com/magazine/2025/08/18/the-number>; Sara

commentators have suggested that President Trump achieved this surge in wealth by using the political influence and official powers of the presidency to grow his businesses.² Such claims are bolstered by the fact that since President Trump's return to office, multiple federal agencies have purchased goods or services from his businesses. For example, in September, President Trump announced that the 2026 G20 Summit would be held at one of his properties, Trump National Doral.³ The Department of State had been soliciting bids from U.S. cities to host the event, and it gave no indication of how President Trump's property was selected over others, or on what terms.⁴ Such a deal could violate the Emoluments Clause of the U.S. Constitution, which prohibits the President from accepting any payment beyond a salary from the federal government or any of the States. U.S. Const. art. II, § 1, cl. 7.

Similarly, public reporting indicates that the U.S. Coast Guard recently began selling alcoholic beverages from Trump Winery and Trump Cidery in Coast Guard Exchanges in Washington, D.C. and Centreville, Virginia.⁵ 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.⁶ President Trump is the sole donor and beneficiary of the trust, while his son Donald Trump Jr. serves as the trustee, meaning President Trump may earn income from the businesses administered by the trust while in office.⁷ It is unclear how the Coast Guard decided to sell Trump-branded wine and cider and whether it considered the deal's compliance with the Emoluments Clause. The requested records will shed light on these questions, and allow the public to evaluate whether President Trump has engaged in any unconstitutional conduct.

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

² Dorn, *Trump's Net Worth Drops \$1.1 Billion*, Forbes (Nov. 22, 2025 at 3:59 PM), <https://www.forbes.com/sites/saradorn/2025/11/22/trumps-net-worth-drops-11-billion/>.

³ See, e.g., Kirkpatrick, *supra* note 1; Russ Buettner, *Trump's Finances Were Shaky. Then He Began to Capitalize on His Comeback.*, NY Times (July 3, 2025), <https://www.nytimes.com/2025/07/02/us/trump-finances-crypto.html>; Brian Slodysko and Will Weissert, *For Sale: Trump is Leveraging Power of His Office to Reap Profits for Family Businesses*, AP News (July 18, 2025 at 3:29 PM), <https://apnews.com/article/trump-businesses-trump-organization-white-house-conflicts-of-interest-b970b5681b27f86dc461ff473be23fa>.

⁴ The White House, *President Trump Makes Announcements*, Sep. 5, 2025, at 46:45 (YouTube, Sept. 5, 2025), [youtube.com/watch?time_continue=3328&v=zBxO-z-3cE4&embeds_referring_euri=https%3A%2F%2Fwww.whitehouse.gov%2F&source_ve_path=Mjg2NjY](https://www.youtube.com/watch?time_continue=3328&v=zBxO-z-3cE4&embeds_referring_euri=https%3A%2F%2Fwww.whitehouse.gov%2F&source_ve_path=Mjg2NjY).

⁵ Public Notice: 2026 United States' Host Year of the G20, 90 Fed. Reg. 1215 (Jan. 7, 2025), <https://www.govinfo.gov/content/pkg/FR-2025-01-07/pdf/2025-00018.pdf>.

⁶ 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>.

⁷ Everson, *supra* note 5.

⁷ *Id.*

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

Sincerely,

/s/ Kayvan Farchadi
Senior Counsel