



December 22, 2025

Submitted via email: [FOIAResquest@state.gov](mailto:FOIAResquest@state.gov)

U. S. Department of State  
Information Access Liaison Office, A/SKS/IAP/IAL  
2201 C Street N.W., Suite B266  
Washington, D.C. 20520-0000

**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 State ("DOS") regulations.

Specifically, CREW requests:

1. Records sufficient to show the DOS'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 DOS'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 DOS's formal or informal policies regarding transactions with businesses owned or controlled by the President of the United States.
4. All communications referencing the DOS'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 DOS's procedures for documenting transactions with businesses owned or controlled by the President of the United States.

6. All communications referencing the DOS'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 DOS 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 22 C.F.R. § 171.16(j)(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.<sup>1</sup> Several

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<sup>1</sup> 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.<sup>2</sup> 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, the Department of Homeland Security launched an advertising campaign to recruit Immigration and Customs Enforcement employees on social media platforms, including President Trump's platform, Truth Social.<sup>3</sup> In addition, the Coast Guard recently began selling alcoholic beverages from Trump Winery and Trump Cidery in Coast Guard Exchanges in Washington, D.C. and Centreville, Virginia.<sup>4</sup> These deals may 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 suggests that the DOS agreed to hold the 2026 G20 summit at one of President Trump's properties, Trump National Doral. According to a notice in the Federal Register on July 7, 2025, the DOS was soliciting proposals from U.S. cities to host the event.<sup>5</sup> Proposals were to include summaries of why the venue was uniquely qualified to host the summit, letters of support from local officials, and information about event spaces, transportation, and security.<sup>6</sup> But on September 5, 2025, without explanation, President Trump announced that the G20 summit would be held at Trump National Doral.<sup>7</sup> Though he claimed that the resort would host the summit "at-cost and would receive no

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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/>.

<sup>2</sup> 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>.

<sup>3</sup> See, e.g., Owen Shroyer (@OwenShroyer1776), X (Sept. 8, 2025 at 1:20 PM),  
<https://x.com/OwenShroyer1776/status/1965102913631780999>; PatriotTakes (@patriottakes), X (Sept. 11, 2025 at 3:14 PM), <https://x.com/patriottakes/status/1966218856982086125>; The WallStreetRanter (@WallStreet\_Rant), X (Oct. 3, 2025 at 2:57 AM),  
[https://x.com/WallStreet\\_Rant/status/1974005986198221090](https://x.com/WallStreet_Rant/status/1974005986198221090); Ron Filipkowski (@RonFilipkowski), X (Dec. 13, 2025 at 7:56 AM), <https://x.com/RonFilipkowski/status/1999825844387164200>.

<sup>4</sup> 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>.

<sup>5</sup> 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>.

<sup>6</sup> *Id.*

<sup>7</sup> 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).

profit from either the State Department or a foreign government,”<sup>8</sup> the details of the proposal were not made public. It is not clear how the DOS arrived at the decision to hold the G20 summit at Trump National Doral or whether it considered the plan’s compliance with the Emoluments Clause. The requested records will shed light on these questions, and allow the public to assess 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 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](http://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](mailto:kfarchadi@citizensforethics.org) and [foia@citizensforethics.org](mailto: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.

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<sup>8</sup> Jennifer Jacobs et al., *Trump Announces Plans to Host 2026 G20 Summit at His Doral Resort*, ABC News (Sept. 5, 2025 at 7:21 PM), <https://www.cbsnews.com/news/trump-g20-summit-2026-doral-resort-florida/>.

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Where possible, please produce records in electronic format. Please send the requested records to [kfarchadi@citizensforethics.org](mailto:kfarchadi@citizensforethics.org) and [foia@citizensforethics.org](mailto: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