



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

January 30, 2026

Nicholas Banco
National Park Service
1849 C Street, Room 2214
Washington, DC 20240

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 Interior (“DOI”) regulations.¹

Specifically, CREW requests, from March 1, 2025 to the date this request is processed:

1. Final decisions, policies, memoranda, or other internal documents related to records, historical artifacts, monuments, and other physical materials moved or relocated pursuant to or as a result of DOI’s implementation of Executive Order 14253, *Restoring Truth and Sanity to American History*² and Secretary Order #3431.³
2. Records sufficient to provide the current locations of all records, historical artifacts, monuments, and other materials moved or relocated pursuant to or as a result of DOI’s implementation of Executive Order 14253, *Restoring Truth and Sanity to American History* and Secretary Order #3431.

The above request excludes agency records consisting solely of news articles, press clippings, and other publicly-available material, so long as the records include no accompanying discussion by agency officials].

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.

¹ 43 C.F.R. § 2.

² Exec. Order No. 14253, 90 C.F.R. 14559 (Apr. 3, 2025).

³ Sec. Order 3431, *Restoring Truth and Sanity to American History*, Dep’t. of Interior, (May 20, 2025), <https://www.doi.gov/document-library/secretary-order/so-3431-restoring-truth-and-sanity-american-history>.

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).

On March 27, 2025, President Trump issued Executive Order 14253, *Restoring Truth and Sanity to American History* (“the Executive Order”).⁴ The purpose of the Executive Order is to counter what the Trump Administration calls a “revisionist movement” that “seeks to undermine the remarkable achievements of the United States by casting its founding principles and historical milestones in a negative light.”⁵ To advance this policy, the Trump administration aims to “restore the Smithsonian Institution to its rightful place as a symbol of inspiration and American greatness” by removing “improper ideology.”⁶ It also directs the Vice President and the Office of Management and Budget to work with Congress to ensure that future appropriations “prohibit expenditures on exhibits or programs that degrade shared American values, divide Americans based on race, or promote programs or ideologies inconsistent with federal law and policy.”⁷

⁴ See *supra* n. 2.

⁵ *Id.* Sec. 1.

⁶ *Id.* Sec. 1; Sec. 2(a).

⁷ The White House released a list of 20 Smithsonian exhibits that it alleges are being used to frame historical events through “ideological” narratives instead of factual evidence. Those exhibits include an educational campaign at the National Museum of African American History and Culture titled “Being Antiracist”; an exhibit at the National Museum of the American Latino that portrays the U.S. as stolen land and characterizes U.S. history as rooted in colonization; and depictions of Benjamin Franklin as a slave owner at the National Museum of American History; an exhibit titled “LGBTQ+ History” at the National Museum of American History lauding the 50th anniversary of Title IX with a focus on transgender athletes. *President Trump is Right About the Smithsonian*, The White House (Aug. 21, 2025),

The Executive Order further directs the Secretary of the Interior to “ensure that all public monuments, memorials, statues, markers, or similar properties within the Department of the Interior’s jurisdiction do not contain descriptions, depictions, or other content that inappropriately disparage Americans past or living (including persons living in colonial times)”⁸ It orders the Secretary to “focus on the greatness of the achievements and progress of the American people...”⁹ Additionally, the Secretary is directed to “improve the infrastructure” of Independence National Historical Park in Philadelphia, Pennsylvania and the Executive Order directs that this “shall be complete by July 4, 2026, the 250th anniversary of the signing of the Declaration of Independence.”¹⁰

DOI has taken steps to implement the Executive Order. On May 20, 2025, Secretary of the Interior Doug Burgum signed Secretary Order 3431 (“SO 3431”), directing NPS and other land management bureaus to restore Independence Hall and review properties for “inappropriate content.”¹¹ In response to SO 3431, the Organization of American Historians, the largest professional society dedicated to American history, stated that it “represents a clear and troubling intrusion into the integrity of historical presentation within the National Park Service” and that it “poses a threat to the interpretation of American history at NPS sites.”¹² On January 23, 2026, the National Park Service also removed a series of signs that memorialized the nine people enslaved by George Washington at the President’s House, the only federal historical site that addresses the history of slavery in America.¹³

The records CREW seeks would shed light on NPS’s implementation of the Executive Order and its motivation to remove specific content from sites within the department’s jurisdiction. There is a sustained and significant interest in the Administration’s actions as it

<https://www.whitehouse.gov/articles/2025/08/president-trump-is-right-about-the-smithsonian/>; Ashleigh Fields, *White House lists 20 objectionable Smithsonian exhibits*, *The Hill* (Aug. 22, 2025),

<https://thehill.com/homenews/administration/5465414-trump-administration-smithsonian-shakeup-exhibits/>.

⁸ *Supra* n. 2.

⁹ *Id.* Sec. 4(iii).

¹⁰ *Id.* Sec. 3.

¹¹ *Supra* n. 3.

¹² *Statement in Response to Secretary Order 3431 and Censorship of History in the National Park Service*, OAH (June 18, 2025),

<https://www.oah.org/advocacy-statement/statement-in-response-to-secretary-order-3431-and-censorship-of-history-in-the-national-park-service/>; see also *Statement on Executive Order “Restoring Truth and Sanity to American History,”* OAH (March 31, 2025),

<https://www.oah.org/2025/03/31/statement-on-executive-order-restoring-truth-and-sanity-to-american-history/> (describing the Executive Order as a “disturbing attack on core institutions and the public presentation of history, and indeed on historians and history itself”).

¹³ Joe Kottke and Phil Helsel, *Philadelphia sues after slavery exhibits were taken down from President’s House site*, *NBC News* (Jan. 23, 2026),

<https://www.nbcnews.com/news/us-news/philadelphia-sues-slavery-exhibits-taken-presidents-house-site-rcna255535>.

relates to the Executive Order.¹⁴ And given the Administration's rush to make significant changes to America's public sites in advance of the 250th anniversary of the signing of the Declaration of Independence, mere months from now, there is an urgent need to inform the public of how and why these significant decisions are being made. The American public has a right to know its history in all of its complexity. The records requested here would shed significant light on the Administration's brazen attempt to re-write America's story.

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").

¹⁴ Michelle Stoddart, Katherine Faulders, Rachel Scott, and Will Steakin, *Museums and parks must remove some items related to race and gender: Executive order*, ABC News (March 27, 2025), <https://abcnews.go.com/Politics/museums-parks-remove-items-related-race-gender-executive/story?id=120236863>; Max Matza, *Trump targets 'anti-American ideology' at Smithsonian museums*, BBC (Mar. 27, 2025), <https://www.bbc.com/news/articles/cdjy1jmvvwzo>; Darlene Superville, *Trump executive order to force changes at Smithsonian Institution, targeting funding for programs with 'improper ideology'*, PBS (Mar. 28, 2026), <https://www.pbs.org/newshour/nation/trump-executive-order-to-force-changes-at-smithsonian-institution-targeting-funding-for-programs-with-improper-ideology>; Chloe Veltman, *Trump executive order seeks to 'restore' American history through Smithsonian overhaul*, NPR (Mar. 28, 2025), <https://www.npr.org/2025/03/27/nx-s1-5342914/smithsonian-president-trump-executive-order>; Graham Bowley and Robin Pogrebin, *The Smithsonian Faces New Pressure to Submit to Trump's Will*, The New York Times (Jan. 8, 2026), <https://www.nytimes.com/2026/01/08/arts/design/smithsonian-trump-pressure.html>; Meg Kinnard, Gary Fields, and Calvin Woodward, *Smithsonian responds to White House pressure by handing over more plans on its exhibits*, AP (Jan. 14, 2025), <https://apnews.com/article/smithsonian-deadline-trump-250-027cef04e347d5519b528e7dd632d65b>; Laura Fay and Scott Jacobson, *Slavery displays removed from Philadelphia historical site after Trump directive*, CBS News (Jan. 23, 2026), <https://www.cbsnews.com/philadelphia/news/presidents-house-independence-mall-slavery-trump/>; Jake Spring, *National park signs related to Native Americans, climate change to be removed*, The Washington Post (Jan. 27, 2026), <https://www.washingtonpost.com/climate-environment/2026/01/27/national-parks-signs-censorship/>.

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

Sincerely,

Mahnoor Imran
Press Associate