



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

August 11, 2025

**SUBMITTED VIA FOIA PAL**

FOIA Officer  
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 (“State”) regulations.

Specifically, CREW requests records sufficient to identify any expenditures by State payable to the owners and operators of the following properties in connection with any activity at those properties between July 25, 2025 and July 29, 2025:

1. Trump Turnberry
2. Trump International Golf Links Aberdeen

The above requests includes records of both any expenditures made to the owners and operators of these properties and any expenditures to third parties in connection with activities taking place at these properties.

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 22 C.F.R. § 171.16(j), 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).

President Trump made a widely-publicized trip to Scotland in July 2025 that has raised significant public concerns about his use of his official position to benefit his personal business interests.<sup>1</sup> In addition to spending the majority of his time in Scotland at his properties at Trump Turnberry and Trump International Golf Links Aberdeen, where he and his sons unveiled a new 18-hole golf course,<sup>2</sup> President Trump repeatedly publicly promoted his Scotland properties, including during diplomatic meetings with British Prime Minister Keir Starmer.<sup>3</sup> This conduct implicates public concerns that President Trump is using his office for personal financial benefit in two ways. First, his repeated visits to his Scotland properties necessarily includes all manner of personal staff, advance staff, Secret Service personnel, State personnel, and other federal employees to attend those properties as well, very likely incurring costs payable to President Trump's properties. Second, his constant promotion of his Scotland properties—including when conducting diplomatic meetings—was facilitated by the American taxpayers who funded the entirety of the trip and the various fora in which he engaged in that promotion.

Reporting from President Donald Trump's first term and after he first left office revealed the Department of State spent substantial sums at Trump-owned properties at

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<sup>1</sup> Cat Zakrzewski and Emily Davies, [Trump hosts Starmer in Scotland, promoting his own golf club](https://www.washingtonpost.com/politics/2025/07/28/trump-starmer-golf-trade/), *The Washington Post*, July 28, 2025

<https://www.washingtonpost.com/politics/2025/07/28/trump-starmer-golf-trade/>

<sup>2</sup> Will Weissert and Darlene Superville, [Trump caps his Scottish visit by opening a new golf course and promoting his family brand](https://apnews.com/article/trump-golf-new-scottish-course-family-profits-207ec2a182508f46325653952869052e), *AP News*, July 29, 2025

<https://apnews.com/article/trump-golf-new-scottish-course-family-profits-207ec2a182508f46325653952869052e>

<sup>3</sup> *Id.*

home and abroad, including \$233,732 at Trump's Turnberry Hotel in Scotland in 2018.<sup>4</sup> This example is just part of the millions of taxpayer dollars spent at Trump properties during President Trump's first administration.<sup>5</sup> The requested records will similarly inform the public how much, if any, taxpayer money is being spent at properties that the president owns and profits from, which is a matter of public interest.

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 [REDACTED] and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or call me at [REDACTED]. 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>4</sup> Jennifer Hansler, [Trump's trip to his Turnberry resort cost the State Department at least \\$233K, review finds](https://www.cnn.com/2019/07/29/politics/trump-turnberry-resort-cost-state-department-oig), CNN, July 29, 2019

<https://www.cnn.com/2019/07/29/politics/trump-turnberry-resort-cost-state-department-oig>

<sup>5</sup> Jordan Libowitz and Caitlin Moniz, [The Secret Service spent nearly \\$2 million at Trump properties](https://www.citizensforethics.org/reports-investigations/crew-investigations/the-secret-service-spent-nearly-2-million-at-trump-properties/), *Citizens for Responsibility and Ethics in Washington*, May 23, 2022

<https://www.citizensforethics.org/reports-investigations/crew-investigations/the-secret-service-spent-nearly-2-million-at-trump-properties/>

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Where possible, please produce records in electronic format. Please send the requested records to [REDACTED] and [foia@citizensforethics.org](mailto:foia@citizensforethics.org) or by mail to [REDACTED], Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,



[REDACTED]  
Research Intern