



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

April 9, 2026

Leah Fairman
Office of the Secretary
MS-7328, MIB
1849 C Street, NW
Washington, DC 20240
osfoia@ios.doi.gov

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 the Interior (“DOI”) regulations.

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

1. All communications referencing Secretary Burgum and the National Energy Dominance Council’s visit to Venezuela in March 2026. Custodians for this search can be limited to the Office of the Secretary and the Office of the Deputy Secretary.
2. All records referencing the shipment or transfer of gold from Venezuela to the United States, including documents or memoranda about the terms of the transfer or the intended recipients.

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).

Disclosure of the requested records will likely contribute to public understanding of the operations of the federal government. Recent reporting describes the unexplained shipment of \$100 million of gold from Venezuela to the United States facilitated by Department officials after meetings in Venezuela with oil and mining executives.¹ This followed the United States' widely-reported military intervention in Venezuela, leading to the capture of Venezuela's former leader Nicolás Maduro.² Secretary Burgum has emphasized the opportunity to develop Venezuela's mineral and precious metal resources.³

However, reports highlighting longstanding corruption in the Venezuelan mining industry raise concern about the nature of these exchanges.⁴ The requested records would shed light on the scope of the Department's involvement and the extent to which private or intermediary entities influenced government decision-making. Given the significant questions raised about the role of U.S. agencies facilitating access to foreign natural resources, disclosure will meaningfully inform the public.

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

¹ Spencer Kimball, *U.S. Brought Back \$100 Million of Gold from Venezuela, Interior Secretary Burgum Says*, CNBC (Mar. 25, 2026), <https://www.cnbc.com/2026/03/25/venezuela-gold-burgum-trump-rodriguez-maduro.html>.

² Vanessa Buschschlüter, *Who is Running Venezuela After US Forces Seized Maduro?*, BBC (Mar. 26, 2026), <https://www.bbc.com/news/articles/crmlz7r0zrxo>.

³ Kimball, *supra* note 1.

⁴ Lilia Luciano, *Venezuela's New Gold Rush Moves at "Trump Speed," but Ignores a \$25 Million Question*, CBS (Mar. 6, 2026), <https://www.cbsnews.com/news/venezuela-new-gold-rush-trump-speed-25-million-question/>.

April 9, 2026

Page 3

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 [REDACTED] 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 [REDACTED] 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