



CITIZENS FOR  
RESPONSIBILITY &  
ETHICS IN WASHINGTON

April 14, 2026

National Archives and Records Administration  
Donald J. Trump Presidential Library  
8601 Adelphi RD, Room 1900  
College Park, MD 20740

*Submitted via email: trump.library@nara.gov*

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) submits this request for records to the National Archives and Records Administration (“NARA”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and agency regulations.

Specifically, CREW requests:

1. From January 20, 2017 to January 20, 2021, all legal opinions, and records containing legal advice, issued by the Office of White House Counsel or Office of Legal Counsel regarding the Domestic Emoluments Clause or the Foreign Emoluments Clause to the U.S. Constitution, and all communications by or among the Council of Economic Advisers, Office of the United States Trade Executive, Office of the Chief of Staff, Office of White House Counsel, or National Economic Council regarding such opinions and advice.
2. From November 4, 2020 to January 20, 2021, all records and communications regarding presidential pardons (including potential and requested pardons not ultimately issued) created, sent, or received by the Office of Administration, Homeland Security Council, Office of the Vice President, Office of the Chief of Staff, Office of the First Lady, Office of Communications, Office of White House Counsel, Office of Intergovernmental Affairs, Office of Legislative Affairs, or Office of Political Affairs.

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, minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records.

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

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*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), CREW requests a waiver of all fees associated with processing this request for records. Records responsive to 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 5 U.S.C. § 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).

The first request concerns President Trump's and his Administration's understanding of, and compliance with, the Emoluments Clauses to the Constitution, see U.S. Const. art. I, § 9, cl. 8; *id.* art. II, § 1, cl. 7, and the processes by which President Trump exercises his exclusive authority to issue pardons, see U.S. Const. art. II, § 2, cl. 1.

Upon winning the election in 2016, President Trump refused to follow the advice of the Director of the Office of Government Ethics to divest from his business.<sup>1</sup> Instead, during his presidency, foreign governments paid Trump millions of dollars through his businesses.<sup>2</sup> In fact, foreign governments made it part of their lobbying strategies.<sup>3</sup> Trump maintained these constitutionally prohibited business dealings and took steps to keep his financial interests secret.<sup>4</sup>

In response, the attorneys general of Maryland and the District of Columbia filed two lawsuits seeking to stop President Trump's improper acceptance of emoluments while in

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<sup>1</sup> *Walter Shaub says America should have right to know motivations of its leaders*, CBS News (Jul. 6, 2017),

<https://www.cbsnews.com/news/walter-shaub-office-of-ethics-director-resignation-interview/>.

<sup>2</sup> *The intensifying threat of Donald Trump's emoluments*, CREW (Aug. 28, 2024),

<https://www.citizensforethics.org/reports-investigations/crew-reports/the-intensifying-threat-of-donald-trumps-emoluments/>.

<sup>3</sup> Jonathan O'Connell and Mary Jordan, *For foreign diplomats, Trump hotel is place to be*, The Washington Post (Nov. 18, 2016),

[https://www.washingtonpost.com/business/capitalbusiness/2016/11/18/9da9c572-ad18-11e6-977a-1030f822fc35\\_story.html](https://www.washingtonpost.com/business/capitalbusiness/2016/11/18/9da9c572-ad18-11e6-977a-1030f822fc35_story.html).

<sup>4</sup> Katie Rogers, *Trump on Releasing His Tax Returns: From 'Absolutely' to 'Political Prosecution'*, NY Times (Jul. 9, 2020), <https://www.nytimes.com/2020/07/09/us/politics/trump-taxes.html>.

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office.<sup>5</sup> Preliminary rulings refusing to dismiss those lawsuits were pending at the Supreme Court when President Trump left office, causing the Court to dismiss them as moot but leaving the merits of the claims against President Trump untouched.<sup>6</sup> An Inspector General report found that the Trump administration's General Services Administration "ignored the Constitution" to maintain this free-for-all opportunity to funnel money to the then-president.<sup>7</sup>

Since returning to the White House in January 2025, President Trump's net worth has increased by an estimated \$3 billion, reportedly peaking at \$7.3 billion in September 2025.<sup>8</sup> Several 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 business.<sup>9</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>10</sup> In addition, the Coast Guard sold alcoholic beverages from Trump Winery and Trump Cidery in Coast Guard Exchanges in Washington,

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<sup>5</sup> Press Release, District of Columbia Office of the Attorney General, D.C. & Maryland AGs Sue Trump for Constitutional Violations (Jun. 12, 2017), <https://oag.dc.gov/release/dc-maryland-ags-sue-trump-constitutional>.

<sup>6</sup> Adam Liptak, *Supreme Court Ends Emoluments Suits Against Trump*, NY Times (Jan. 25, 2021), <https://www.nytimes.com/2021/01/25/us/emoluments-trump-supreme-court.html>.

<sup>7</sup> U.S. Office of Inspector General, JE19-002, *Evaluation of GSA's Management and Administration of the Old Post Office Building Lease 16* (2019), [https://www.gsaig.gov/sites/default/files/ipa-reports/JE19-002%20OIG%20EVALUATION%20REPORT-GSA%27s%20Management%20%26%20Administration%20of%20OPO%20Building%20Lease%20Janua%20ry%2016%202019\\_Redacted.pdf](https://www.gsaig.gov/sites/default/files/ipa-reports/JE19-002%20OIG%20EVALUATION%20REPORT-GSA%27s%20Management%20%26%20Administration%20of%20OPO%20Building%20Lease%20Janua%20ry%2016%202019_Redacted.pdf).

<sup>8</sup> Dan Alexander, *Presidency Boosts Trump's Net Worth By \$3 Billion In A Year*, Forbes (Sept. 9, 2025), <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 Dorn, *Trump's Net Worth Drops \$1.1 Billion*, Forbes (Nov. 22, 2025), <https://www.forbes.com/sites/saradorn/2025/11/22/trumps-net-worth-drops-11-billion/>.

<sup>9</sup> See, e.g., Kirkpatrick, *supra* note 12; Russ Buettner, *Trump's Finances Were Shaky. Then He Began to Capitalize on his Comeback.*, NY Times (Jul. 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 (Jul. 18, 2025), <https://apnews.com/article/trump-businesses-trump-organization-white-house-conflicts-of-interest-b970b5681b27f86dcd461ff473be23fa>.

<sup>10</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>.

D.C. and Centreville, Virginia.<sup>11</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.

The second request concerns President Trump's broad exercise of the pardon power. President Trump pardoned his political allies during his first term, with the majority of pardons occurring on his last day in office, merely hours before President-elect Joe Biden was sworn in—and notably, just days after the January 6 attack on the Capitol. The list included his former chief strategist and longtime ally Steve Bannon, as well as his former top fundraiser Elliot Brody.<sup>12</sup>

In this second term, President Trump has granted clemency to at least 1,600 people,<sup>13</sup> including many of his political allies and donors. On his first day in office, President Trump gave “full, complete, and unconditional” pardons to about 1,500 people who participated in the January 6, 2021 attack on the U.S. Capitol,<sup>14</sup> characterizing the participants as “peaceful patriotic protesters.”<sup>15</sup> President Trump has since commuted sentences for another 13 people and one company, and pardoned 72 individuals and another company.<sup>16</sup> Examples include Nikola founder Trevor Martin, who donated more than \$1.8 million to a Trump fundraising committee in October 2025,<sup>17</sup> and Changpeng Zhao, whose company Binance facilitated the \$2 billion purchase of Trump-affiliated World Liberty Financial's stablecoin.<sup>18</sup>

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<sup>11</sup> See Zach Everson, *Trump Wine Hits Government Shelves*, Forbes (Nov. 7, 2025), <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), <https://www.independent.co.uk/news/world/americas/us-politics/trump-wine-cider-coast-guard-exchanges-b2860989.html>.

<sup>12</sup> Yuliya Talmazan, Rachel Elbaum and Sara Mhaidli, *Full list of Trump's last-minute pardons and commuted sentences*, NBC News (Jan. 20, 2021), <https://www.nbcnews.com/politics/donald-trump/full-list-trump-s-last-minute-pardons-commuted-sentences-n1254806>.

<sup>13</sup> Josh Dawsey, *Trump Promises Mass Pardons to Staff Before Leaving Office*, The Wall Street Journal (Apr. 10, 2026), <https://www.wsj.com/politics/policy/trump-promises-mass-pardons-to-staff-before-leaving-office-d7274d32>.

<sup>14</sup> Martin Pengelly and Rachel Leingang, *Trump issues 1,500 'unconditional' pardons over January 6 Capitol attack*, The Guardian (Jan. 20, 2025), <https://www.theguardian.com/us-news/2025/jan/20/trump-executive-orders-jan-6-pardons>.

<sup>15</sup> *January 6: A Date Which Will Live in Infamy*, The White House, <https://www.whitehouse.gov/j6/> (last visited Apr. 14, 2026).

<sup>16</sup> Louise Radnofsky and Kara Dapena, *A Visual Breakdown of Trump's Pardon Spree*, The Wall Street Journal (Dec. 10, 2025), [https://www.wsj.com/politics/policy/a-visual-breakdown-of-trumps-pardon-spree-c8287388?mod=article\\_inline](https://www.wsj.com/politics/policy/a-visual-breakdown-of-trumps-pardon-spree-c8287388?mod=article_inline).

<sup>17</sup> Corinne Ramey and Ben Foldy, *Trump Pardons Nikola Founder Trevor Milton*, The Wall Street Journal (Mar. 28, 2025), <https://www.wsj.com/us-news/trump-pardons-nikola-founder-trevor-milton-948b1311>.

<sup>18</sup> Angus Berwick, Patricia Kowsmann, and Rebecca Ballhaus, *How a Billionaire Felon Boosted Trump's Crypto Company en Route to a Pardon*, The Wall Street Journal (Oct. 29, 2025), <https://www.wsj.com/finance/currencies/binance-trump-crypto-pardon-cz-changpeng-zhao-1007fd9e9>.

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Trump also granted clemency to the former US representative George Santos, who pleaded guilty to wire fraud and identity theft. “He lied like hell,” Trump said, “But he was 100% for Trump.”<sup>19</sup> Most recently, President Trump is reported to have promised to “pardon everyone who has come within 200 feet of the Oval” before he leaves office.<sup>20</sup>

The requested records will significantly contribute to the general public’s understandings of federal government operations by disclosing the first Trump Administration’s policy and legal frameworks regarding presidential pardons and emoluments and how their relationship to his current policies. These disclosures are significant to the public in any event, but particularly so at present, as President Trump himself is continuously reported to personally benefit from asserting his presidential powers, including the pardoning of political allies.<sup>21</sup> Furthermore, reports indicate that President Trump’s nearly 1,600 pardons cost the American people \$1.3 billion in fines and restitutions.<sup>22</sup>

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 hundreds of thousands of 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.

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<sup>19</sup> Lauren Aratani, *Trump reportedly says he’ll issue mass pardons at end of his presidential term*, The Guardian (Apr. 11, 2026), <https://www.theguardian.com/us-news/2026/apr/11/trump-mass-pardons-end-of-presidential-term>.

<sup>20</sup> Dawsey, *supra* note 16.

<sup>21</sup> See Matthew Purdy and Luke Broadwater, *Trump Vowed to Crack Down on Fraudsters, but He’s Pardoned Dozens*, NY Times (Mar. 19, 2026), <https://www.nytimes.com/2026/03/19/us/politics/trump-fraudsters-pardons.html>.

<sup>22</sup> Andrew Solender, *Trump’s pardons cost the U.S. \$1.3 billion, per House Dem report*, Axios (Jun. 17, 2025), <https://www.axios.com/2025/06/17/trump-pardons-cost-democrats-report>.

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.

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 Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, D.C. 20004.

Sincerely,

/s/ Kayvan Farchadi