

Exhibit H



May 22, 2026

FOIA Officer
Anti-Weaponization Fund

c/o Brian Flannigan
FOIA and Privacy Office
Civil Division
1100 L Street NW, Room 8400
Washington, DC 20530
civil.routing.foia@usdoj.gov

cc: Andrew Fiorillo
Initial Request Staff
Office of Information Policy
6th Floor
441 G Street, NW
Washington DC 20530

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 Justice (“DOJ”) regulations to the Anti-Weaponization Fund (“Fund”) established by the Settlement Agreement executed by DOJ and the Internal Revenue Service May 18, 2026 in connection with *Trump v. Internal Revenue Service*, No. 26-cv-20609-KMW (D.D.C. filed Jan. 29, 2026)¹ and Acting Attorney General Todd Blanche’s May 18, 2026 Order.²

Specifically, CREW requests:

1. All Fund formation and charter documents. This request includes, among other things, all documents establishing the Fund as a legal entity and identifying its principal members and management.

¹ Settlement Agreement, *Trump v. Internal Revenue Service*, No. 1:26-cv-20609-KMW (S.D. Fla. May 18, 2026), available at <https://www.justice.gov/opa/media/1441201/dl?inline> (hereinafter Settlement Agreement).

² Order of Acting Att’y Gen. T. Blanche (May 18, 2026), available at https://www.justice.gov/opa/media/1441086/dl?utm_medium=email&utm_source=govdelivery (hereinafter AG Order).

May 22, 2026

Page 2

2. All Fund policies, procedures, guidelines, directives, or other guidance establishing the operations of the Fund and the performance of its staff.
3. All Fund policies, procedures, guidelines, directives, or other guidance regarding standards of ethics and the management of conflicts of interest.
4. All Fund policies, procedures, guidelines, directives, or other guidance regarding standards of eligibility for any person or entity that has or might seek compensation or remuneration from the Fund.
5. All Fund policies, procedures, guidelines, directives, or other guidance regarding how the fund determines, will determine, or has determined to pay any person or entity out of the Fund.
6. All records regarding any payments to any person or entity out of the Fund.
7. Records sufficient to identify the institution or institutions maintaining or servicing any account that holds assets of the Fund.
8. Records sufficient to identify all persons with access to any account that holds assets of the Fund, regardless of whether that person is authorized to make disbursements, withdrawals, or transfers from any such account.
9. All Fund policies, procedures, guidelines, directives, or other guidance regarding the role of President Trump (in his official or personal capacity) or any Plaintiff in *Trump v. IRS*, with respect to the Fund or any legal obligation of the Fund to them.

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.

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

May 22, 2026

Page 3

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).

As discussed below in the Expedited Processing Request, this request seeks foundational documents regarding the Fund, which was established by DOJ and endowed with almost \$1.8 billion to be distributed to supporters of President Trump who have been investigated, prosecuted, and scrutinized by the federal government, no matter their misconduct or the propriety of the federal law enforcement action against them. As further described below, the Fund appears designed to operate with minimal transparency. This request will significantly contribute to the public's understanding of the structure and operations of the Fund.

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").

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

May 22, 2026

Page 4

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.

Expedited Processing Request

CREW requests and is entitled to expedited processing of this request because there is “[a]n urgency to inform the public about an actual or alleged Federal Government activity” and CREW is “primarily engaged in disseminating information.” *Id.* § 552(a)(6)(E)(v)(II).

CREW is “primarily engaged in disseminating information” to the public, as most recently confirmed by the Court in *Citizens for Responsibility and Ethics in Washington v. U.S. Department of Justice (“CREW v. DOJ”)*, No. 25-4426, 2026 WL 472589, at *10 (D.D.C. Feb. 19, 2026). This “standard ‘requires that information dissemination be the main [and not merely an incidental] activity of the requestor,’” but “publishing information ‘need not be [the organization’s] sole occupation.’” *Protect Democracy Project, Inc. v. U.S. Dep’t of Def.*, 263 F. Supp. 3d 293, 298 (D.D.C. 2017). 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. CREW is a credible requestor and disseminator of information often relied on by major media outlets.³

There is also an “urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(6)(E)(v)(II). The facts demonstrate that such urgency exists because (1) the request concerns a matter of current exigency to the American public; (2) the consequences of delaying a response would compromise a significant recognized interest; and (3) the request concerns federal government activity. *Al-Fayed v. C.I.A.*, 254 F.3d 300, 310 (D.C. Cir. 2001); *see also CREW v. DOJ*, 2026 WL 472589, at *10 (“Because the election cycle is inherently time-limited, delaying a response to CREW’s FOIA requests would inevitably compromise the public’s interest in understanding the nature of the allegedly ongoing effort before the upcoming elections pass by”).

The requested records concern a matter of current exigency to the American public, namely DOJ’s unlawful creation of the Fund and its nearly \$1.8 billion endowment as a resource to pay President Trump’s supporters who have previously been subject to investigation, arrest, and other scrutiny by federal law enforcement, even if such

³ See, e.g., *Citizens for Responsibility and Ethics in Washington*, N.Y. Times, <https://perma.cc/VT6X-DPJM> (last visited Mar. 2, 2026) (list of New York Times articles referencing CREW spanning over a decade); Ed Pilkington & Dharna Noor, *Top US Ethics Watchdog Investigating Trump Over Dinner with Oil Bosses*, The Guardian (May 15, 2024), <https://perma.cc/G7T5-T6AV> (referring to CREW as “Top US ethics watchdog”).

May 22, 2026

Page 5

investigation, arrest, or scrutiny was entirely justifiable. The creation of the Fund is unprecedented in American history in its origins, nature, and scope, has been the subject of extreme public scrutiny and debate (including by members of Congress), and directly implicates the integrity of the federal government.

As an initial matter, the Fund was nominally created to settle a collusive \$10 billion lawsuit filed by President Trump, his family, and his business stemming from a leak of President Trump's tax returns by a government contractor. In dismissing *Trump v. IRS* as a result of the announcement of the settlement, however, the federal judge presiding over the case made clear that neither the IRS nor DOJ "filed any documents ensuring that settlement was appropriate where there was an outstanding questions as to whether an actual case or controversy existed," as President Trump effectively controlled both sides of the litigation, both by virtue of his place at the head of the executive branch and the fact that the Acting Attorney General is his former personal attorney.⁴

That the Fund is designed to serve the personal interests of the President and his allies is apparent on the face of the Settlement Agreement, which purports to establish it. Far outside the scope of his claims in *Trump v. IRS*, the Settlement Agreement's recitals recount President Trump's personal grievances with law enforcement actions and investigations into his conduct in the past and decries "Lawfare" and "Weaponization" by "Democrat elected officials, political and career federal employees, contractors, and agents," and the Biden Administration in particular.⁵ And while the Settlement Agreement disclaims any right by President Trump or other *Trump v. IRS* plaintiffs from receiving money from the fund, on May 19, 2026 Acting Attorney General Blanche issued an addendum to the Settlement Agreement purporting to permanently bar the United States from pursuing effectively any claim against President Trump, his family, or his businesses for their past conduct.

The Fund is also transparently designed to operate in secret and at the whims of the President. Determinations regarding claims made to the fund are made by a five-person board, curated by the Acting Attorney General, that is not required to make public its "procedures for submitting, receiving, processing, and granting or denying claims."⁶ The president also retains the power to "remove any Member without cause."⁷ Based on the Settlement Agreement's parameters, claimants are likely to include those prosecuted for the attack on the January 6, 2021 attack on the Capitol. Recent reporting indicates that Ed Martin—a former DOJ attorney tasked with investigating prosecutors who pursued past investigations into the president and his allies—predicted as such.⁸

⁴ Erik Larson, *Trump IRS Suit Settlement Questioned by Judge as Case Closed*, Yahoo! Finance (May 19, 2026), <https://finance.yahoo.com/economy/policy/articles/trump-irs-suit-settlement-questioned-155557901.html>.

⁵ Settlement Agreement ¶ I.C.

⁶ *Id.* ¶ IV.C.

⁷ *Id.* ¶ IV.B.

⁸ Ryan J. Reilly, *DOJ official told GOP ally that big payouts were coming for Jan. 6 defendants*, NBC News (May 19, 2026), <https://www.nbcnews.com/politics/justice-department/doj-official-told-gop-ally-big-payouts-comin-g-jan-6-defendants-rcna343847>.

May 22, 2026

Page 6

Notably, President Trump granted clemency to nearly 1,600 people convicted in connection with the Capitol attack on his first day in office.⁹ He has since called the event “a day of love”¹⁰ and characterized insurrectionists as “warriors.”¹¹

Further, according to a proclamation from the Acting Attorney General in connection with the Settlement Agreement, the U.S. Department of Treasury will deposit \$1,776,000 into an account for the sole use by the Anti-Weaponization Fund.¹² That amount—a reference to the year that the colonies declared independence—is purportedly a “projected valuation of future claimants’ claims.”¹³ Once funds are deposited into the “Designated Account,” the U.S. has “no liability whatsoever for the protection or safeguarding of those funds.”¹⁴ It remains unclear whether the “Designated Account” is privately or publicly operated.

In addition, the DOJ should grant expedited processing because this request presents a “matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity that affect public confidence.” 28 C.F.R. § 16.5(e)(1)(iv). The Anti-Weaponization Fund raises the gravest concerns about President Trump’s continued misuse of the federal government to not only enact retribution upon his opponents, but also enrich himself and his personal and political allies. It has been the subject of widespread and intense media coverage and public scrutiny, including by members of Congress.¹⁵

⁹ Katherine Faulders and Alexander Mallin, *Trump issues sweeping pardons and commutations for Jan. 6 rioters*, ABC News (Jan. 20, 2025),

<https://abcnews.com/Politics/trump-teases-pardoning-jan-6-rioters-day-1/story?id=117880690>.

¹⁰ Dan Barry and Alan Feuer, *‘A Day of Love’: How Trump Inverted the Violent History of Jan. 6*, NY Times (Jan. 5, 2025), <https://www.nytimes.com/2025/01/05/us/politics/january-6-capitol-riot-trump.html>.

¹¹ Sarah Fortinsky, *Trump calls Jan. 6 defendants ‘warriors’*, The Hill (Jun. 9, 2024), <https://thehill.com/homenews/campaign/4713140-trump-calls-j6-defendants-warriors/>.

¹² AG Order ¶ C.

¹³ *Id.*

¹⁴ *Id.* ¶ D.

¹⁵ See, e.g., Alex Miller, *Republicans Recoil as Trump’s Billion-Dollar DOJ ‘Slush Fund’ for Allies Threatens ICE, Border Patrol Plan*, Fox News (May 21, 2026),

<https://www.foxnews.com/politics/republicans-recoil-trumps-billion-dollar-doj-slush-fund-allies-threatens-ice-border-patrol-plan>; Tom Hals and Jonathan Stempel, *Trump’s \$1.776 Billion ‘Weaponization’ Fund Sparks Outrage, But Court Challenges Will Be Tough*, Reuters (May 20, 2026),

<https://www.reuters.com/legal/government/trumps-1776-billion-weaponization-fund-sparks-outrage-court-challenges-will-be-2026-05-20/>; Justin Papp, *Trump ‘Slush Fund’ a Flashpoint as Senate Heads Home Without Funding DHS*, CNBC (May 21, 2026),

<https://www.cnn.com/2026/05/21/ballroom-funding-trump-congress-immigration-funding.html>; Finn Hartnet, *‘Stupid on Stilts’: Republican Senator Rips Trump’s Slush Fund*, The New Republic (May 21, 2026),

<https://newrepublic.com/post/210785/stupid-stilts-republican-senator-tillis-trump-slush-fund>; Sophie Brams, *House Republican: ‘We’re Going to Kill’ Trump’s Nearly \$1.8B ‘Anti-Weaponization’ Fund*, The Hill (May 20, 2026),

<https://thehill.com/homenews/house/5888185-fitzpatrick-trump-anti-weaponization-fund/>; Hannah Rabinowitz et al., *Trump Administration Creates \$1.776 Billion Fund for Allies of the President After He Drops Lawsuit Against IRS*, CNN (May 18, 2026),

<https://www.cnn.com/2026/05/18/politics/trump-irs-lawsuit-fund-for-allies>; Steve Benen, *Democratic Senator Makes the Case That Trump’s ‘Slush Fund’ is an Impeachable Offense*, MSNOW (May

21, 2026),

<https://www.msn.com/story/news/politics/2026/05/21/democratic-senator-makes-the-case-that-trumps-slush-fund-is-an-impeachable-offense>.

<https://www.msn.com/story/news/politics/2026/05/21/democratic-senator-makes-the-case-that-trumps-slush-fund-is-an-impeachable-offense>.

May 22, 2026

Page 7

Expedition of this request—seeking records that will shed light on the formation, structure, and operation of the Fund—is absolutely essential to educate the public about the operations of the government and the details of what is already being recognized as an unprecedented act of corruption and self-dealing. They will inform the public where the assets of the Fund are located, how they are being managed and by whom, and how the Fund is disposing of them, and what, if any ethical and conflicts safeguards are in place.

The undersigned certifies that the above statement is true and correct.

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 Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

/s/ Kayvan Farchadi

21, 2026),
<https://www.ms.now/rachel-maddow-show/maddowblog/democratic-senator-makes-the-case-that-trumps-slush-fund-is-an-impeachable-offense>; Jonathan Chait, *Trump's \$1.8 Billion Slush Fund Is Worse Than Stealing*, *The Atlantic* (May 19, 2026),
<https://www.theatlantic.com/ideas/2026/05/trump-anti-weaponization-fund-january-6/687215/>;
Sara Dorn, *More Republicans Blast Trump's \$1.8 Billion 'Anti-Weaponization' Fund as Blanche Pleas for Their Approval*, *Forbes* (May 21, 2026),
<https://www.forbes.com/sites/saradorn/2026/05/21/more-republicans-blast-trumps-18-billion-anti-weaponization-fund-as-blanche-pleas-for-their-approval/>; Andrew Solender, *Democrats Move to Shut Down Trump's \$1.8B 'Weaponization' Fund*, *Axios* (May 20, 2026),
<https://www.axios.com/2026/05/20/democrats-trump-slush-fund-doj-bill-raskin>.