



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

June 25, 2026

SUBMITTED VIA FOIA.GOV and FOIARequests@uspto.gov

USPTO FOIA Officer
United States Patent and Trademark Office
PO Box 1450
Alexandria, VA 22313-1450

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 United States Patent and Trademark Office ("USPTO") regulations.

Specifically, CREW requests all records related to the agency's trademark applications for the "Board of Peace" mark (Serial Nos. 76720938 and 76720939), both filed by Director John A. Squires in late 2025 and January 2026 including;

1. The applications themselves;
2. Communications related to or referencing these trademarks and trademark applications;
3. Any legal opinions, guidance memoranda, or internal analyses regarding the authority or basis for the USPTO to file as an applicant on behalf of a non-USPTO entity;
4. Any legal opinions, guidance memoranda, or internal analyses regarding the basis for naming the USPTO as the owner/applicant of these trademark applications;
5. Any legal opinions, guidance memoranda, or internal analyses regarding the identifications of services in these trademark applications; and
6. Any records related to the fee waiver and paper-submission petition granted in connection with these applications, including communications referencing the fee waiver.

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. Following the launch of the Board of Peace, an international organization established by President Trump, the USPTO submitted two trademark applications tied to the "Board of Peace" asserting that the agency is temporarily stewarding the marks to prevent misuse.¹ Because President Trump reportedly has considerable control over the Board of Peace and its finances,² the USPTO's application raises questions about whether the agency is being to shield the ownership and financial

¹ Press Release, Ranking Member Raskin Probes Trump's Corrupting of Federal Trademark Office to Advance "Board of Peace" Enrichment Scheme (Mar. 19, 2026), <https://democrats-judiciary.house.gov/media-center/press-releases/ranking-member-raskin-probes-trump-s-corrupting-of-federal-trademark-office-to-advance-board-of-peace-enrichment-scheme> [hereinafter Raskin Press Release].

² Michael Mattler, *Establishing the Board of Peace: Key Questions About the Launch of the Trump Administration's New Peace-Building Initiative*, Just Sec. (Feb. 9, 2026), <https://www.justsecurity.org/130867/board-of-peace-key-questions/>.

structure of the Board of Peace. These filings are also a departure from agency practice and present conflict of interest risks.³ There are additional concerns that the applications filed on behalf of the Board of Peace may not meet the basic requirements for a trademark and may present a violation of the Lanham Act.⁴ These records would give insight into USPTO's decision to submit these applications.

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 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 expedited processing of this request, pursuant to 5 U.S.C. § 552 and 37 C.F.R. § 102.6(e). CREW is entitled to expedited processing because (1) there is an "urgency to inform the public about an actual or alleged Federal Government activity" and one of CREW's "main professional activit[ies]...is information dissemination," 37 C.F.R. § 102.6(e)(1)(iv), and (2) these same facts raise possible questions, in a "matter of widespread and exceptional media interest in which there exist questions about the Government's integrity that affect public confidence" *Id.* at § 102.6(e)(1)(iii).

³ Raskin Press Release, *supra* note 1.

⁴ Letter from Rep. Jamie Raskin, to Hon. John A. Squires (Mar. 18, 2026), <https://democrats-judiciary.house.gov/sites/evo-subsites/democrats-judiciary.house.gov/files/evo-media-document/2026-03-18-raskin-to-squires-uspto-re-board-of-peace.pdf>.

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 tens 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.⁵

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).

First, the USPTO’s stewardship of the Board of Peace marks is a matter of current exigency. The agency’s filing of two trademark applications tied to the Board of Peace—an organization established by President Trump, and one over which he reportedly retains significant operational and financial control—is unprecedented and ongoing. USPTO’s representation that it is “temporarily stewarding” the marks to prevent misuse departs from established agency practice and raises immediate questions about whether the agency is acting on behalf of or being used to obscure the ownership and financial structure of an entity closely tied to the President. The public has a present interest in understanding why USPTO departed from its norms.

Second, delay would compromise a significant recognized interest. Congressional oversight of the USPTO’s actions is active and escalating,⁶ and the agency’s unprecedented

⁵ 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”).

⁶ See Press Release, Ranking Member Raskin’s Opening Statement at Hearing on Trump’s Politicization of Patent and Trademark Office (Mar. 25, 2026), <https://democrats-judiciary.house.gov/media-center/press-releases/ranking-member-raskin-s-opening-statement-at-hearing-on-trump-s-politicization-of-patent-and-trademark-office>.

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stewardship of the marks is ongoing.⁷ Each day USPTO retains the marks without public scrutiny is a day in which additional filings, transfers, or administrative decisions may issue – foreclosing meaningful public review of the underlying choices. The public's ability to assess whether the applications meet the basic requirements of the Lanham Act, whether they implicate conflicts of interest, and whether foreign funding relationships factor into the Board of Peace's structure depends on access to USPTO's records before the situation calcifies. The interest in informed public debate, and in informed congressional oversight conducted in parallel, cannot be vindicated after the fact.

Finally, the request clearly concerns federal government activity. The request seeks records of USPTO, a federal agency, regarding decisions made by USPTO personnel to file, prosecute, and administer two trademark applications. *Al-Fayed*, 254 F.3d at 310.

For the foregoing reasons, USPTO should grant expedited processing. 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 Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

/s/ Kayvan Farchadi

⁷ See Press Release, Ranking Member Raskin Escalates Probe of U.S. Trademark Office's Involvement in Covering Up Trump's "Board of Peace" Global Enrichment Scheme (May 5, 2026), <https://democrats-judiciary.house.gov/media-center/press-releases/ranking-member-raskin-escalates-probe-of-us-trademark-office-s-involvement-in-covering-up-trump-s-board-of-peace-global-enrichment-scheme>; Letter from Rep. Jamie Raskin, to Hon. John A. Squires (May 5, 2026), <https://democrats-judiciary.house.gov/sites/evo-subsites/democrats-judiciary.house.gov/files/evo-media-document/2026-05-05-raskin-to-squires-uspto-re-board-of-peace.pdf>.