CREW

CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

November 2, 2026

FOIA Office
Office of Management and Budget
725 17th Street NW, Suite 9272
Washington, DC 20503

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 Office of Management and Budget ("OMB") regulations. *See* 5 C.F.R. §§ 1303.1-1303.94.

Specifically, from October 1, 2026 to the date this request is processed, CREW requests the following records maintained by OMB:

1. All records related to the policy described in President Trump's October 26, 2026 Truth Social post stating: "Anybody reporting Voter Fraud in the past Elections, or the upcoming 2026 Midterm Election, will be paid $1,000,000 upon the arrest and conviction of those that created the Fraud!"

    a. This includes records describing who is responsible for implementing the policy, and what procedures they will use to evaluate reports of voter fraud, determine whether the reports warrant rewards and pay out those rewards.

2. All OMB policies, procedures, guidelines, directives, or other guidance related to the offer or payment of rewards for reports of voter fraud.

3. Records sufficient to identify what funds have been or will be used to pay rewards for reports of voter fraud.

4. All records regarding any payments to any person or entity as a reward for a report of voter fraud.

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 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)(iii) and 5 C.F.R. § 1303.94(a), 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 activities by CREW and the general public in a significant way. *See* 5 U.S.C. § 552(a)(4)(A)(iii); *accord* 5 C.F.R. § 1303.94(a). 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 requested records will significantly contribute to the public's understanding of President Trump's shocking announcement that the government will pay a $1,000,000 reward for any report of voter fraud that results in an arrest and conviction.[1] President Trump announced the new initiative through a Truth Social post on October 26, 2026, just eight days before the midterm election.[2] He offered no further information—no insight into who would oversee the program, how reports of voter fraud would be verified, or what funds would be used to pay out rewards.

The lack of information is especially concerning in the context of the federal government's aggressive efforts to target voter fraud, which it baselessly insists is widespread. In July, President Trump announced that the Department of Homeland Security ("DHS") had found over 250,000 noncitizens were registered to vote in four states.[3] Around

[1] Donald J. Trump (@realDonaldTrump), Truth Social (Oct. 26, 2026), https://truthsocial.com/@realDonaldTrump/posts/117508870323063258.
[2] *Id*.
[3] The White House, *President Trump Delivers an Address to the Nation*, at 34:33–35:23 (YouTube, July 16, 2026), https://www.youtube.com/live/iIlqG0untYM?si=K3WOzEgelNPB6bpv&t=2073.

the same time, DHS sent letters to the four states' top election officials demanding that they cooperate with the agency to investigate and remove flagged voters from the states' rolls,[4] and threatened noncomplying states with fines and criminal sanctions.[5] On October 13, 2026, the Department of Justice ("DOJ") sent California a second letter, demanding that it review a list of potential noncitizen registrants within 48 hours and set aside up to 20,000 ballots.[6] When California refused, the federal government filed suit to enjoin California from counting the ballots until the voters' citizenship could be confirmed.[7] DOJ made a similar demand of Washington on October 26, 2026, asking the state to segregate 400 ballots cast by potential noncitizens.[8]

Despite these sweeping efforts, the federal government has not uncovered widespread voter fraud. Instead, these efforts have intimidated voters. On October 21, 2026, a federal court enjoined DHS and its components from conducting field operations targeting individuals DHS personnel "know, suspect, or should reasonably know or suspect are U.S. citizens."[9] The court found that by sending armed officers to individuals' homes and communities just months ahead of the midterm election, the agency likely violated the Voting Rights Act's prohibition against voter intimidation.[10]

President Trump's new voter fraud bounty program is likely to foment the same fears. Potential voters, especially those who have recently attained U.S. citizenship, might reasonably fear being wrongfully reported to the federal government, and decline to participate in the midterm election. The public needs the requested records to better understand how the program will operate and what risk it poses to voters.

CREW makes the request primarily for non-commercial purposes. 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.

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[4] Secretary Markwayne Mullin (@SecMullinDHS), X (July 17, 2026), https://x.com/SecMullinDHS/status/2078172229934760403?s=20.
[5] U.S. Dep't of Homeland Sec., *Secretary Mullin Delivers Remarks on President Trump's Update on Election Integrity Efforts*, at 15:29–16:19 (YouTube, July 17, 2026), https://www.youtube.com/live/jjuVaRAEpe4?si=pTn36LsEKqW4J4-U&t=929.
[6] Letter from R. Trent McCotter, Acting Deputy Att'y Gen., to Shirley N. Weber, Cal. Sec'y of State (Oct. 13, 2026), https://admin.cdn.sos.ca.gov/pdf/other/2026-10-13-ltr-to-ca-sos.pdf.
[7] Compl., *United States v. California*, No. 26-cv-12025 ¶ 63 (C.D. Cal. Oct. 15, 2026).
[8] Press Release, U.S. Att'y's Off., Western Dist. of Wash., *Federal data shows hundreds of non-citizens registered to vote in Washington* (Oct. 26, 2026), https://www.justice.gov/usao-wdwa/pr/federal-data-shows-hundreds-non-citizens-registered-vote-washington.
[9] Order Granting Prelim. Inj., *Cal. Nurses Ass'n v. Mullin*, No. 26-cv-10680, at 18 (N.D. Cal. Oct. 21, 2026).
[10] *Id.* at 12-13.

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 FOIA request pursuant to 5 U.S.C. § 552(a)(6)(E) and 5 C.F.R. § 1303.40(e)(ii). CREW is entitled to expedited processing because CREW "is primarily engaged in disseminating information" and there is an "urgency to inform the public concerning actual or alleged Federal Government activity." 5 U.S.C. § 552(a)(6)(E)(v)(II); *accord* 5 C.F.R. § 1303.40(e)(ii). In addition, this request warrants expedited processing because it concerns "possible questions, in a matter of widespread and exceptional public interest, about the Government's integrity which affect public confidence." 5 C.F.R. § 1303.40(e)(iv).

CREW is "primarily engaged in disseminating information" to the public. This standard "requires that information dissemination be the main [and not merely an incidental] activity of the requestor, although it need not be their sole occupation." *Landmark Legal Found. v. EPA*, 910 F. Supp. 2d 270, 276 (D.D.C. 2012) (quoting H.R. Rep. No. 104–795, at 26 (1996)) (emphasis deleted). 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. CREW is a credible requestor and disseminator of information often relied on by major media outlets.

Further, there is an "urgency to inform the public" about the requested records because (1) they concern a matter of current exigency to the American public; (2) the consequences of delaying a response would compromise a significant recognized interest; and (3) they describe federal government activity. *See Al-Fayed v. CIA*, 254 F.3d 300, 310 (D.C. Cir. 2001).

First, the President's creation of a new voter fraud bounty program just eight days before a federal election presents a matter of current exigency. *See Protect Democracy Project, Inc. v. DOJ*, 498 F. Supp. 3d 132, 140 (D.D.C. 2020) (holding that "DOJ's potential interference with postal services" in order to investigate voter fraud "was a matter of 'current exigency,' particularly given the imminence of Election Day and the widespread media attention to the issue of voter fraud and slowed postal service deliveries"). The President's offer of massive rewards for reports of voter fraud will undoubtedly intimate voters. Some people who are legally entitled to vote, especially those who recently attained U.S. citizenship, may decide that voting is not worth the risk of a baseless accusation and investigation by law enforcement. Others may become the subject of such an investigation, but have no time to prove their citizenship before the midterm election. These are exceedingly time-sensitive problems. *See, e.g.*, *League of Women Voters of U.S. v. Newby*, 838 F.3d 1, 9 (D.C. Cir. 2016) (quoting *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014)).

Second, delay would compromise the public's significant recognized interests in preventing the disenfranchisement of eligible voters and safeguarding the integrity of elections. *See CREW v. DOJ*, 826 F. Supp. 3d 73, 87–89 (D.D.C. 2026) (delay would compromise significant recognized interests in voting rights and voter privacy); *Protect Democracy*, 498 F. Supp. 3d at 140 (delay would compromise significant recognized interests in voting rights and election integrity). Without timely disclosure of the requested records, President Trump's voter fraud bounty program will likely disenfranchise eligible voters and undermine confidence in American elections. As already explained, some eligible voters likely will be too intimidated to go to the polls, while others will be ensnared in investigations even after election day. But the program may also convince some that there really is widespread voter fraud, and that American elections are vulnerable to being "rigged and stolen," as President Trump himself has suggested.[11] This, too, is a serious risk, including to the certifications of this November's election results. "[D]emocratic stability" requires "public acceptance" of election results. *Bush v. Gore*, 531 U.S. 1046, 1047-48 (2000) (Scalia, J., concurring). The requested records, if released in a timely fashion, can offer some transparency around this program and assuage fears of widespread voter fraud.

Third, the requested records concern federal government activity. The President's efforts to create a new voter fraud bounty program, and OMB's efforts to implement that program and pay out the promised rewards, are plainly activities of the federal government.

Separately, this matter has generated widespread and exceptional public interest and raises questions about the government's integrity. Over the course of just three days, the President's two-sentence post has been covered by a number of major media outlets, including ABC News, Fox News, NBC News, the New York Times, Newsweek, and Rolling

[11] The White House, *supra* note 3 at 35:15-37:39.

Stone.[12] The story will likely maintain interest through the midterm election, as results are assessed, and as the federal government investigates fraud reports and pays out rewards under this new program.

For all of these reasons, CREW's request warrants expedited processing. The undersigned certifies that the representations in this expedited processing request are true and correct to the best of his knowledge and belief.

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 [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 or by mail to Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, P.O. Box 14596, Washington, D.C. 20044.

Sincerely,

Kayvan Farchadi
Senior Counsel

[12] Michelle Stoddart, *Trump Offers $1M Reward for Voter Fraud Tips that Result in Conviction*, ABC News (Oct. 26, 2026), https://abcnews.com/Politics/trump-offers-1m-reward-people-report-voter-fraud/story?id=137581908; Jason Gunn, *Trump Offers $1 Million Reward for Voter Fraud Tips that Lead to Convictions*, Live Now Fox (Oct. 27, 2026), https://www.livenowfox.com/news/trump-offers-1-million-reward-voter-fraud-tips-lead-convictions; Jane C. Timm, *Trump Offers $1 Million Reward for Voter Fraud Tips that Lead to Convictions*, NBC News (Oct. 26, 2026), https://www.nbcnewyork.com/elections/trump-reward-voter-fraud-tips-lead-convictions/6563440/; Tyler Pager, *Trump Dangles $1 Million Reward for Reporting Voter Fraud*, N.Y. Times (Oct. 26, 2026), https://www.nytimes.com/2026/10/26/us/trump-1-million-reward-voter-fraud-tips.html; Steve Mollman, *Trump Offers $1M for Election Fraud Convictions Week Before Midterms*, Newsweek (Oct. 26, 2026), https://www.newsweek.com/trump-1m-voter-fraud-reward-midterms-12621891; Jack Crosbie, *Trump Offers $1,000,000 Voter Fraud Bounty*, Rolling Stone (Oct. 26, 2026), https://www.rollingstone.com/politics/politics-news/trump-offers-voter-fraud-bounty-1235648160/.