

# CREW | citizens for responsibility and ethics in washington

September 25, 2017

BY ELECTRONIC MAIL: [os\\_foia@ios.doi.gov](mailto:os_foia@ios.doi.gov)

Clarice Julka  
Office of the Secretary  
U.S. Department of the Interior  
MS-7328, MIB  
1849 C Street, N.W.  
Washington, D.C. 20240

Re: Freedom of Information Act Request

Dear Ms. Julka:

Citizens for Responsibility and Ethics in Washington ("CREW") makes this request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and U.S. Department of the Interior ("DOI") regulations.

Specifically, CREW requests:

- (1) Copies of all communications to or from Secretary Ryan Zinke, Special Assistant to the Secretary Caroline Boulton, Special Assistant to the Secretary Christine Bauserman, and/or Special Assistant to the Secretary Downey Magallanes that mention or relate to Lara Trump and/or her July 20, 2017 meeting with Secretary Zinke; and
- (2) Copies of any documents received by Secretary Zinke and/or his staff during the July 20, 2017 meeting with Lara Trump; and
- (3) Copies of any records describing the attendees at the July 20, 2017 meeting with Lara Trump, the agenda of the meeting, and/or any planned follow up actions by DOI.

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, as well as emails to which the subjects of this request were cc'ed or bcc'ed.

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).

### **Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A) and DOI 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 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).

According to Secretary Zinke's personal schedule for July 2017, he had a meeting on July 20, 2017 with President Trump's daughter-in-law, Lara Trump, and Blair Brandt to discuss topics including "[w]ild horses," "DOI's Doggy Days policy," and "[i]mproving animal welfare."<sup>1</sup> Though Mr. Brandt was also listed as attending the meeting, the subject of the entry on Secretary Zinke's calendar was listed as "Lara Trump Meeting," suggesting that Ms. Trump, an animal welfare advocate who reportedly "wants to be the first First Family member that champions an animal issue,"<sup>2</sup> was considered the key participant in the meeting.

In addition to being part of President Trump's family, Ms. Trump also is a senior consultant at the digital marketing firm Giles-Parscale.<sup>3</sup> As a result, she is intimately involved with President Trump's campaign committee and the Republican National Committee, where she "has a hand in digital, fundraising and merchandise efforts already underway for the next presidential race."<sup>4</sup> The requested records would shed light on the role Ms. Trump's personal and political relationships played in scheduling the meeting and whether she participated in the meeting in her personal or political capacity. The records would also increase public knowledge of DOI's decision making process for scheduling meetings between Secretary Zinke and advocates on public policy issues as well as how the department follows up on meetings with advocates.

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<sup>1</sup> See <https://www.doi.gov/sites/doi.gov/files/uploads/17-01012ca.pdf>.

<sup>2</sup> Darren Samuelsohn, *Lara Trump's Controversial Pet Issue*, *Politico*, May 29, 2017, available at <http://www.politico.com/story/2017/05/29/lara-trump-pet-problem-238906>.

<sup>3</sup> Julie Bykowics, *Lara Trump Hired by Trump Campaign's Digital Vendor*, *Associated Press*, March 29, 2017, available at <https://www.usnews.com/news/politics/articles/2017-03-29/lara-trump-hired-by-trump-campaigns-digital-vendor>; Lachlan Markay and Asawin Suebsaeng, *Lara Trump 'Running the Show' at 'Trump TV'*, *The Daily Beast*, August 7, 2017, available at <http://www.thedailybeast.com/lara-trump-running-the-show-at-trump-tv>.

<sup>4</sup> Katie Glueck, *The Face of Donald Trump's 2020 Campaign*, *McClatchyDC*, June 7, 2017, available at <http://www.mcclatchydc.com/news/nation-world/national/article154701289.html>.

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 and systematically disseminates information to the public in several ways. CREW's website receives tens of thousands of page views every month. The website includes a blog that reports on and analyzes 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. In addition, CREW posts documents it receives under the FOIA on its website, and those documents have been visited hundreds of thousands of times.

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 contact me at (202) 408-5565 or [mcorley@citizensforethics.org](mailto:mcorley@citizensforethics.org). Also, if CREW's request for a fee waiver is not granted in full, please contact our office immediately upon making such a determination.

Where possible, please produce records in electronic format. Please send the requested records to me either at [mcorley@citizensforethics.org](mailto:mcorley@citizensforethics.org) or at Matt Corley, Citizens for Responsibility and Ethics in Washington, 455 Massachusetts Ave., N.W., Washington, D.C. 20001. Thank you for your assistance in this matter.

Sincerely,



Matthew Corley  
Chief Investigator