

December 13, 2019

**BY EMAIL: FOIA@usss.dhs.gov**

Latita Payne  
United States Secret Service  
Freedom of Information Act and Privacy Act Branch  
245 Murray Lane, SW Building T-5  
Washington, D.C. 20223

Re: Freedom of Information Act Request

Dear Ms. Payne:

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 Department of Homeland Security (DHS”) regulations.

Specifically, CREW requests copies of records of or reflecting the use of government funds to provide security and any other services for Donald Trump Jr.’s trip to Mongolia in August 2019, dating from July 31, 2019 to the present.

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 those who were 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).

## Fee Waiver Request

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

As the son of President Trump, Donald Trump Jr. is entitled to Secret Service protection. On December 11, 2019 *ProPublica* reported that President Trump's son, Donald Trump Jr. took a trip to Mongolia to hunt an endangered species of argali sheep.<sup>1</sup> The article also reported that "Hunting guides and scouts who worked on Trump Jr.'s trip said the president's son was joined by what they described as five American bodyguards."<sup>2</sup> While there is nothing wrong with the son of a president receiving protection from the Secret Service, it is fair for taxpayers to have questions about the cost for certain activities, especially potentially dangerous ones that involve hunting in foreign countries.

This administration has a history of undertaking travel and recreation that ends up costing the American people hundreds of thousands of dollars--from the security costs for President Trump's family to go on international business trips, to the cost of golf cart rentals for the Secret Service to protect the president when he is golfing.<sup>3 4</sup> If the American people are footing the bill for President Trump's adult son to be protected during an endangered sheep hunting trip, they deserve to know the full cost.

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.

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<sup>1</sup> Pearson, Jake and Anand Tumurogoo. "Donald Trump Jr. Went to Mongolia, Got Special Treatment From the Government and Killed an Endangered Sheep." *ProPublica*. December 11, 2019. <https://www.propublica.org/article/trump-inc-podcast-donald-trump-jr-went-to-mongolia-got-special-treatment-from-the-government-and-killed-an-endangered-sheep>

<sup>2</sup> *Id.*

<sup>3</sup> Libowitz, Jordan, *CREW Gets Trump Family Secret Service Spending Documents*. Available at: <https://www.citizensforethics.org/crew-gets-trump-family-business-secret-service-spending-documents/>

<sup>4</sup> Rohrlich, Justin, Trump's golf cart rental expenses set to surpass \$500,000, Quartz, May 29, 2019 available at: <https://qz.com/1629811/trumps-golf-cart-rental-expenses-set-to-surpass-500000/>

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 blog posts 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. 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 lhonl-stuenkel@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 lhonl-stuenkel@citizensforethics.org, or Linnaea Honl-Stuenkel, Citizens for Responsibility and Ethics in Washington, 1101 K Street, N.W., Suite 201, Washington, D.C. 20005. Thank you for your assistance in this matter.

Sincerely,

Linnaea Honl-Stuenkel

Digital Communication Associate