



December 13, 2019

BY ELECTRONIC MAIL: os_foia@ios.doi.gov

Cathy Willis
FWS FOIA Officer
U.S. Fish and Wildlife Service
MS:IRTM
5275 Leesburg Pike
Falls Church, VA 22041

Re: Freedom of Information Act Request

Dear Ms. Willis:

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, including records or notes related to communications, between former Acting Director and current Deputy Director of the U.S. Fish and Wildlife Service Aurelia Skipwith and Executive Vice President of the Trump Organization Donald Trump, Jr. between July 30, 2019 and September 31, 2019; and
- (2) Copies of any and all licenses to import argali sheep into the United States granted between July 20, 2017 and September 31, 2019 to Donald Trump Jr. or Kevin Small; and
- (3) Copies of all communications by any employee of the U.S. Fish and Wildlife Service regarding Donald Trump Jr. or Kevin Small’s licenses to import any trophy hunted animals between July 20, 2019 and September 31, 2019.

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).

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.¹ He reportedly shot and killed one, and was granted a permit to do so by the Mongolian government retroactively. He may also have been granted a licence by the U.S. government to bring back the carcass of the argali. Donald Trump Jr. also hunted with a Republican political donor, Kevin Small, who also appears to have killed an argali.

The President's sons, Donald Trump, Jr. and Eric Trump, are known trophy hunters who have hunted elephants, and other animals.² According to a Cable News Network source, members of the Trump family discussed a desire to change the U.S. Fish and Wildlife Service rules on trophy hunting; Donald Trump, Jr. purportedly made this issue a priority "early on" in the Trump campaign.³ If Donald Trump Jr. did import his killed argali, it would not be the first time that his trophy hunting hobby intersected with the U.S. government. If Trump's request, or Small's request to import the sheep carcasses were given special treatment in any way, the American people deserve to know. If the U.S. government has advanced the trophy hunting hobby of the politically connected, that is of great public interest, and must be brought to light.

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

¹ 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>

² Signore, John Del. "Photos: Donald Trump's Sons Awesome At Killing Elephants And Other Wildlife." *Gothamist*. March 13, 2012. http://gothamist.com/2012/03/13/photos_donald_trump_sons_awesome_at.php#photo-2.

³ Green, Miranda. "Trump's elephant trophy reversal comes as a surprise to administration employees, interest groups." *CNN Politics*. November 19, 2017. <http://www.cnn.com/2017/11/18/politics/elephant-trophy-reversal-reactions/index.html>.

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

Sincerely,

Linnaea Honl-Stuenkel