

July 19, 2017

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 presidential visitors at the Trump National Golf Club in Bedminster, New Jersey, from May 4, 2017, 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.

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).

It has been widely reported that with the end of the winter season at Mar-a-Lago, President Donald Trump's so-called "winter White House," the President has been spending and will continue to spend weekends at the Trump National Golf Club in Bedminster, New Jersey. During his first stay at Bedminster in early May, the President tweeted that he would be "working out of my home in Bedminster, N.J."¹ During another visit over the Fourth of July holiday, President Trump "reportedly spoke by telephone with Japanese Prime Minister Shinzo Abe and Chinese President Xi Jinping" from his Bedminster estate.² And in an earlier visit on June 10, President Trump was briefed by Deputy National Security Adviser Ricky Waddell while at Bedminster.³ Clearly the Trump National Golf Club in Bedminster has become the "summer White House" where President Trump not only golfs, but also conducts official business. The requested records would help inform the public about the outside influences to which the President is subject, the extent to which he has truthfully represented to the American people how he uses his time at his golf club, and the ability of the Secret Service to perform its statutory responsibility of protecting the President while he is staying at a facility also being used for commercial and recreational 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.

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").

¹ Jonathan D. Salant, *Trump Returning to Bedminster to Spend the Weekend*, *N.J.Com*, June 9, 2017, available at http://www.nj.com/politics/index.ssf/2017/06/trump_returning_to_nj_this_weekend.html.

² Sam Dangremond, *Everything Donald Trump Has Done at His Bedminster Golf Club Since Becoming President*, *Town & Country*, July 17, 2017, available at <http://www.townandcountrymag.com/society/a9588359/donald-trump-bedminster-golf-club-trips/>.

³ *Id.*

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CREW routinely and systematically disseminates information to the public in several ways. CREW's website has received hundreds of thousands visits just since January 20, 2017. 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 all the documents it receives under the FOIA on its website.


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 aweismann@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 aweismann@citizensforethics.org or at Anne L. Weismann, Citizens for Responsibility and Ethics in Washington, 455 Massachusetts Ave., N.W., 6th Floor, Washington, D.C. 20001. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anne L. Weismann', with a long horizontal flourish extending to the right.

Anne L. Weismann
Chief FOIA Counsel