VIA EMAIL AND ONLINE PORTAL

Alexis R. Graves
Departmental FOIA Officer
United States Department of Agriculture
1400 Independence Avenue SW
South Building, Room 4104
Washington, DC 20250-0706
USDAFOIA@ocio.usda.gov

Freedom of Information Act Office
Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street SW
Washington, DC 20536
ICE-FOIA@dhs.gov

Sabrina Burroughs
U.S. Agency for International Development
Ronald Reagan Building
1300 Pennsylvania Avenue NW
Washington, DC 20534
foia@usaid.gov

U.S. Citizenship and Immigration Services
Office of Privacy and Open Government
U.S. Department of Commerce
14th and Constitution Avenue NW
Washington, DC 20230
Via FOIAOnline

FOIA Officer/Public Liaison Kevin Tyrrell
Freedom of Information Act and Privacy Act Branch
U.S. Secret Service
245 Murray Lane SW, Building T-5
Washington, D.C. 20223
FOIA@usss.dhs.gov

Stephanie Carr
OSD/JS FOIA Requester Service Center
Office of Freedom of Information
U.S. Department of Defense
1155 Defense Pentagon
Washington, DC 20301-1155
whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil

Chief Privacy Officer/Chief FOIA Officer
The Privacy Office
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528
foia@hq.dhs.gov
FOIA Public Liaison
Office of Management
Office of the Chief Privacy Officer
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202
EDFOIAManager@ed.gov

FOIA Requester Service Center
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585
foia-central@hq.doe.gov

Michael Marquis
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue SW
Washington, DC 20201
FOIAResquest@hhs.gov

Office of Information Programs and Services
U.S. Department of State
A/GIS/IPS/RL
SA-2, Suite 8100
Washington, DC 20522
foiarequest@state.gov

Ryan Law
FOIA and Transparency
Department of the Treasury
Washington, DC 20220
treasfoia@treaury.gov

Kathy Ray
U.S. Department of Transportation
1200 New Jersey Avenue SE
W94-122
Washington, DC 20590
ost.foia@dot.gov

Freedom of Information Act Office
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 10139
Washington, DC 20410-3000
Via Online Portal

USTR FOIA Office, GSD/RDF
Attn: Chief FOIA Officer Janice Kaye
Office of the U.S. Trade Representative
Anacostia Naval Annex, Building
410/Door 123,
250 Murray Lane SW
Washington, DC 20509
FOIA@ustr.eop.gov

Douglas Hibbard
Chief, Initial Request Staff
Office of Information Policy
U.S. Department of Justice
441 G St NW, 6th Floor
Washington, DC 20530
Via FOIAOnline

Office of the Secretary
Office of the Assistant Secretary for Policy
Office of the Solicitor
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210
foiarequests@dol.gov

Clarice Julka
Office of the Secretary
U.S. Department of the Interior
MS-7328, MIB
1849 C Street NW
Washington, DC 20240
osfoia@ios.doi.gov
Re: Freedom of Information Act Request

Dear FOIA Officers:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, American Oversight makes the following request for records.

Public reporting indicates that the White House has escalated efforts to purge disloyal officials from throughout the government and that this effort has been advanced by a network of far-right conservative activists.¹ President Trump’s head of presidential personnel, John McEntee, has reportedly gathered White House liaisons in order to coordinate this effort.²

American Oversight seeks records to shed light on whether and to what extent the administration is retaliating against officials based on perceptions of political loyalty.

Requested Records

American Oversight requests that your agency produce the following records within twenty business days:

1. All email communications (email messages, email attachments, complete email chains, calendar invitations, and attachments thereto) sent by (1) anyone serving in the capacity of White House Liaison or White House Advisor (including anyone serving as their Chiefs of Staff or Deputies) to (2) anyone with an email address ending in .com / .net / .org / .edu / .mail / .us.

American Oversight has limited its request to sent messages of the specified agency officials to reduce the volume of potentially responsive records. American Oversight still requests complete email chains. So, for example, if the White House Liaison sent a response to an incoming message from an email address specified above, the email chain containing the initially received message and the response is responsive to this request.

Please provide all responsive records from January 1, 2019, through the date the search is conducted.

2. All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, informational material, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) of (1) anyone serving in the capacity of White House Liaison or White House Advisor (including anyone serving as their Chiefs of Staff or Deputies) with or about (2) any of the below specified external entities or individuals:

   i. Virginia “Ginni” Thomas or any person communicating on her behalf, such as Crystal Clayton
   ii. Barbara Ledeen or any person communicating on her behalf
   iii. Becky Norton Dunlop or any person communicating on her behalf

Please provide all responsive records from January 1, 2019, through the date the search is conducted.

3. All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, informational material, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (1) any political appointees* in the immediate front Office of the Secretary (or the senior-most official at your agency) as well as anyone serving in the capacity of White House Liaison or White House Advisor (including anyone serving as their Chiefs of Staff or Deputies) and (2) John
McEntee, head of the Presidential Personnel Office at the White House, or anyone communicating on his behalf.

Please provide all responsive records from February 1, 2020, through the date the search is conducted.

**“Political appointee” should be understood as any person who is a Presidential Appointee with Senate Confirmation (PAS), a Presidential Appointee (PA), a Non-career SES, any Schedule C employees, or any persons hired under Temporary Non-career SES Appointments, Limited Term SES Appointments, or Temporary Transitional Schedule C Appointments.

4. All records reflecting the content of a meeting between (1) anyone serving in the capacity of White House Liaison or White House Advisor (including anyone serving as their Chiefs of Staff or Deputies) and (2) John McEntee, head of the Presidential Personnel Office at the White House, on or about February 20, 2020,3 including any calendar entries, emails and other written communications about the meeting, agendas, lists of meeting attendees, minutes, summaries, handwritten notes, talking points, transcripts, or materials displayed or exchanged during the meeting.

Please provide all responsive records from February 1, 2020, through the date the search is conducted.

**Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and your agency’s regulations, American Oversight 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 will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. Moreover, the request is primarily and fundamentally for non-commercial purposes.

American Oversight requests a waiver of fees because disclosure of the requested information is “in the public interest because it is likely to contribute significantly to public understanding of operations or activities of the government.”4 The public has a significant interest understanding whether the White House is directing a purge of government officials based on whether they are perceived to be sufficiently loyal to the personal and narrow political interests of the president. Records with the potential to shed

---


light on this issue would contribute significantly to public understanding of operations of the federal government, including whether the White House is relying on external entities and individuals to retaliate against government officials because they do not pass a loyalty test. American Oversight is committed to transparency and makes the responses agencies provide to FOIA requests publicly available, and the public’s understanding of the government’s activities would be enhanced through American Oversight’s analysis and publication of these records.

This request is primarily and fundamentally for non-commercial purposes. As a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose and the release of the information requested is not in American Oversight’s financial interest. American Oversight’s mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and Twitter.

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through numerous substantive analyses posted to its website. Examples reflecting this commitment to the public disclosure of documents and the creation of editorial content include the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department’s process for issuing such waivers; posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal; posting

---

records regarding potential self-dealing at the Department of Housing & Urban Development and related analysis;\(^\text{10}\) posting records and analysis relating to the federal government’s efforts to sell nuclear technology to Saudi Arabia;\(^\text{11}\) and posting records and analysis regarding the Department of Justice’s decision in response to demands from Congress to direct a U.S. Attorney to undertake a wide-ranging review and make recommendations regarding criminal investigations relating to the President’s political opponents and allegations of misconduct by the Department of Justice itself and the Federal Bureau of Investigation.\(^\text{12}\)

Accordingly, American Oversight qualifies for a fee waiver.

For the U.S. Department of the Treasury, pursuant to 31 C.F.R. § 1.5(b)(7) and notwithstanding its fee waiver request, American Oversight hereby states that it is willing to pay fees in an amount not more than $25.00.

**Guidance Regarding the Search & Processing of Requested Records**

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and

---


\(^\text{12}\) *Sessions’ Letter Shows DOJ Acted on Trump’s Authoritarian Demand to Investigate Clinton*, AMERICAN OVERSIGHT, [https://www.americanoversight.org/sessions-letter.](https://www.americanoversight.org/sessions-letter)
transcripts, notes, or minutes of any meetings, telephone conversations or discussions.

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.

- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA. It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; American Oversight has a right to records contained in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.

- Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage agency information electronically, and many agencies have adopted the National Archives and Records Administration (NARA) Capstone program, or similar policies. These systems provide options for searching emails and other electronic records in a manner that is reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency’s archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; agencies may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.

---


In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.

Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight to discuss this request. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Dan McGrath at foia@americanoversight.org or 202.897.4213. Also, if American Oversight's request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

Melanie Sloan
Senior Advisor
American Oversight