

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AMERICAN HISTORICAL  
ASSOCIATION, AMERICAN  
OVERSIGHT,

*Plaintiffs,*

v.

DONALD TRUMP, in his official capacity  
as President of the United States and in his  
personal capacity, *et al.*,

*Defendants.*

Case No. 26-cv-01169

**DECLARATION OF ELIZABETH MARX IN SUPPORT OF PLAINTIFFS'  
MOTION FOR A PRELIMINARY INJUNCTION**

I, Elizabeth Marx, hereby declare as follows:

1. I am Deputy Executive Director at American Oversight, a plaintiff in the above-captioned litigation. I use the name Elizabeth Hempowicz professionally. I submit this Declaration in support of Plaintiff's Motion for a Preliminary Injunction. The facts set forth in this Declaration are true and of my own personal knowledge and/or a review of American Oversight's business records.

2. American Oversight is a is a nonpartisan, non-profit corporation organized under section 501(c)(3) of the Internal Revenue Code and incorporated under the laws of the District of Columbia. It is committed to promoting transparency in government, educating the public about government activities, and ensuring the accountability of government officials.

3. Through research and requests made under the Freedom of Information Act (FOIA), 5 U.S.C. § 552 (FOIA), American Oversight uses the information it gathers, and its

analysis of that information, to educate the public about the activities and operations of the federal government through reports, published analyses, press releases and other media.

4. In service of its mission to educate the public about operations and activities of the government, American Oversight has previously submitted FOIA requests to the National Archives and Records Administration (NARA) for presidential records from past presidential administrations that eventually became subject to FOIA by operation of the Presidential Records Act (PRA).

5. As one example, in 2019, upon learning of a reported short list of potential Supreme Court nominees, American Oversight submitted multiple FOIA requests for presidential records related to three individuals on that short list who had served in the White House under President George W. Bush, including Joan Larsen (internal tracking number NARA-19-0258), Don Willett (internal tracking number NARA-19-0268), and Neomi Rao (internal tracking number NAARA-19-0261). Attached as Exhibits A-C are true and accurate copies of those requests.

6. American Oversight has also submitted FOIA requests for records from President Trump's first administration.

7. Before those records became available under FOIA, American Oversight launched a document preservation initiative to ensure that presidential records (and federal agency records) from President Trump's first term were properly preserved.

8. Specifically, in December 2020, the organization filed FOIA requests with numerous federal agencies seeking communications between top agency officials and the White House, to ensure records of at least some White House officials' communications would be properly preserved pursuant to FOIA and the Federal Records Act.

9. Then, on January 20, 2026, American Oversight submitted multiple requests to NARA seeking records from President Trump's first administration.

10. The first request, bearing American Oversight internal tracking number NARA-26-0108, seeks records reflecting external email communications sent by or on behalf of Senior Advisor for Policy Stephen Miller. Attached as Exhibit D is a true and accurate copy of that request.

11. The second request, bearing American Oversight internal tracking number NARA-26-0109, seeks records reflecting external email communications sent by or on behalf of Director of Social Media Dan Scavino. Attached as Exhibit E is a true and accurate copy of that request.

12. The third request, bearing American Oversight internal tracking number NARA-26-0110, seeks records reflecting external email communications sent by or on behalf of Senior Advisor Jared Kushner. Attached as Exhibit F is a true and accurate copy of that request.

13. The fourth request, bearing American Oversight internal tracking number NARA-26-0111, seeks records reflecting external email communications sent by or on behalf of Domestic Policy Council Director Brooke Rollins. Attached as Exhibit G is a true and accurate copy of that request.

14. The fifth request, bearing American Oversight internal tracking number NARA-26-0112, seeks records reflecting external email communications sent by or on behalf of Senior Advisor Ivanka Trump. Attached as Exhibit H is a true and accurate copy of that request.

15. American Oversight is waiting for NARA to issue final determinations or provide responsive records for each of the above five requests.

16. American Oversight is actively planning to submit additional FOIA requests to NARA for records from President Trump's first administration.

17. American Oversight generally disseminates to the public the records it receives in response to FOIA requests on its website.

18. If NARA does not fully process FOIA requests for Presidential records, American Oversight will be unable to disseminate to the public the non-exempt records it would otherwise be entitled to under FOIA.

19. If NARA does not preserve records from former presidential administrations, including President Trump's first administration, American Oversight will permanently be deprived of information that it seeks and intends to seek through FOIA requests to NARA.

20. If individuals and entities that are subject to the Presidential Records Act fail to preserve records as required by the PRA, the records will be lost and American Oversight will not be able to obtain records it has a right to access under the PRA and FOIA.

21. If NARA and individuals and entities subject to the PRA fail to preserve presidential records, American Oversight will be irreparably harmed because the records will be lost forever, and the organization will lose its opportunity to fulfill its mission to educate the public about the operations of the government reflected in those records.

22. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 14, 2026

Respectfully submitted,

/s/ Elizabeth Marx  
ELIZABETH MARX

# EXHIBIT A



February 22, 2019

**VIA ELECTRONIC MAIL**

Chief, Special Access and FOIA Staff (RD-F)  
8601 Adelphi Road, Room 5500  
College Park, MD 20740  
E-mail: [specialaccess.foia@nara.gov](mailto:specialaccess.foia@nara.gov)

George W. Bush Presidential Library and  
Museum  
c/o FOIA Coordinator  
2943 SMU Blvd.  
Dallas, TX 75205  
E-mail: [gwbush.library@nara.gov](mailto:gwbush.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear Chief and FOIA Coordinator:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, the Presidential Records Act (PRA), 44 U.S.C. § 2201 *et seq.*, and the implementing regulations of the National Archives and Records Administration (NARA), 36 C.F.R. Part 1250, American Oversight makes the following request for records of NARA and the George W. Bush Presidential Library and Museum (GWB Library).

**Requested Records**

American Oversight requests that the GWB Library provide access to the following records within twenty business days:

All records of the White House Counsel's Office referencing or relating to former Deputy Assistant Attorney General Joan Larsen.

This request includes, but is not limited to, correspondence (including memoranda, letters, or emails) to or from Ms. Larsen, or on which she is carbon copied or blind carbon copied, and attachments to such correspondence.

Please provide all records from January 1, 2002, to December 31, 2003.

Under the FOIA Improvement Act of 2016, agencies must adopt a presumption of disclosure, withholding information "only if . . . disclosure would harm an interest protected by an exemption" or "disclosure is prohibited by law."<sup>1</sup> If it is your position that any portion of the requested records is exempt from disclosure, American Oversight requests that you provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415

---

<sup>1</sup> FOIA Improvement Act of 2016 § 2 (Pub. L. No. 114-185).



U.S. 977 (1974). As you are aware, a *Vaughn* index must describe each document claimed as exempt with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.”<sup>2</sup> Moreover, the *Vaughn* index “must describe *each* document or portion thereof withheld, and for *each* withholding it must discuss the consequences of disclosing the sought-after information.”<sup>3</sup> Further, “the withholding agency must supply ‘a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.’”<sup>4</sup>

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 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.<sup>5</sup> Claims of nonsegregability must be made with the same degree of detail as required for claims of exemptions in a *Vaughn* index. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, 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 NARA can decrease the likelihood of costly and time-consuming litigation in the future.

### Fees

American Oversight recognizes that NARA does not grant fee waivers for reproduction of archival records or Presidential records subject to FOIA regulations<sup>6</sup> under the authority of 44 U.S.C. § 2116, which allows the Archivist to “charge a fee set to recover the costs for making or authenticating copies or reproductions” of such records. However, NARA regulations state that no search fees will be charged for such records.<sup>7</sup> **Consequently, American Oversight expects that only reproduction fees will be incurred by this request. If NARA believes reproduction fees may exceed \$250, please contact American Oversight immediately.**

### Conclusion

We share a common mission to promote transparency in government. American Oversight looks forward to working with NARA on this request. If you do not understand any part of this request,

<sup>2</sup> *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).

<sup>3</sup> *King v. U.S. Dep’t of Justice*, 830 F.2d 210, 223–24 (D.C. Cir. 1987) (emphases in original).

<sup>4</sup> *Id.* at 224 (citing *Mead Data Central, Inc. v. U.S. Dep’t of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)).

<sup>5</sup> *Mead Data Central*, 566 F.2d at 261.

<sup>6</sup> 36 C.F.R. § 1250.51(a); *see also* 36 C.F.R. § 1250.6(d) (“FOIA applies to [Presidential] records five years after the President and Vice President leave office.”).

<sup>7</sup> 36 C.F.R. § 1250.51(b).

have any questions, or foresee any problems in fully releasing the requested records, please contact Katherine Anthony at [foia@americanoversight.org](mailto:foia@americanoversight.org) or 202.897.3918.

Sincerely,

A handwritten signature in blue ink that reads "Austin Evers". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Austin Evers  
Executive Director  
American Oversight

# EXHIBIT B



February 22, 2019

**VIA ELECTRONIC MAIL**

Chief, Special Access and FOIA Staff (RD-F)  
8601 Adelphi Road, Room 5500  
College Park, MD 20740  
Telephone: (301) 837-3190  
FAX (301) 837-1864  
E-mail: [specialaccess.foia@nara.gov](mailto:specialaccess.foia@nara.gov)

George W. Bush Presidential Library and  
Museum  
c/o FOIA Coordinator  
2943 SMU Blvd.  
Dallas, TX 75205  
[gwbush.library@nara.gov](mailto:gwbush.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear Chief and FOIA Coordinator:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, the Presidential Records Act (PRA), 44 U.S.C. § 2201 *et seq.*, and the implementing regulations of the National Archives and Records Administration (NARA), 36 C.F.R. Part 1250, American Oversight makes the following request for records of NARA and the George W. Bush Presidential Library and Museum (GWB Library).

**Requested Records**

American Oversight requests that the GWB Library provide access to the following records within twenty business days:

The following records related to Don Willett, former Special Assistant to the President and Director of Law and Policy for the White House Office of Faith-Based and Community Initiatives:

- All content from the Don Willett General Files within the Faith-Based and Community Initiatives records;<sup>1</sup> and
- All content from the David Kuo Subject Files within the Faith-Based and Community Initiatives records.<sup>2</sup>

---

<sup>1</sup> See George W. Bush Presidential Library and Museum, *Finding Aid: Faith-Based and Community Initiative, Office of: Don Willett - General Files, 2001-2002*, available at <https://www.georgewbushlibrary.smu.edu/en/Research/Finding-Aids/~media/30D94137C9CD48ADA6D1295F290B8E43.ashx>.

<sup>2</sup> See George W. Bush Presidential Library and Museum, *Finding Aid: Faith-Based and Community Initiative, Office of: David Kuo - Subject Files, 2001-2003*, available at



Under the FOIA Improvement Act of 2016, agencies must adopt a presumption of disclosure, withholding information “only if . . . disclosure would harm an interest protected by an exemption” or “disclosure is prohibited by law.”<sup>3</sup> If it is your position that any portion of the requested records is exempt from disclosure, American Oversight requests that you provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974). As you are aware, a *Vaughn* index must describe each document claimed as exempt with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.”<sup>4</sup> Moreover, the *Vaughn* index “must describe *each* document or portion thereof withheld, and for *each* withholding it must discuss the consequences of disclosing the sought-after information.”<sup>5</sup> Further, “the withholding agency must supply ‘a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.’”<sup>6</sup>

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 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.<sup>7</sup> Claims of nonsegregability must be made with the same degree of detail as required for claims of exemptions in a *Vaughn* index. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, 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 NARA can decrease the likelihood of costly and time-consuming litigation in the future.

### Fees

American Oversight recognizes that NARA does not grant fee waivers for reproduction of archival records and Presidential records subject to FOIA regulations<sup>8</sup> under the authority of 44 U.S.C. § 2116, which allows the Archivist to “charge a fee set to recover the costs for making or authenticating copies or reproductions” of such records. However, NARA regulations state that no

---

<https://www.georgewbushlibrary.smu.edu/en/Research/Finding-Aids/~media/57524E899EA64261A640C0DBDCAA05D6.pdf>.

<sup>3</sup> FOIA Improvement Act of 2016 § 2 (Pub. L. No. 114-185).

<sup>4</sup> *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).

<sup>5</sup> *King v. U.S. Dep’t of Justice*, 830 F.2d 210, 223–24 (D.C. Cir. 1987) (emphases in original).

<sup>6</sup> *Id.* at 224 (citing *Mead Data Central, Inc. v. U.S. Dep’t of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)).

<sup>7</sup> *Mead Data Central*, 566 F.2d at 261.

<sup>8</sup> 36 C.F.R. § 1250.51(a); *see also* 36 C.F.R. § 1250.6(d) (“FOIA applies to [Presidential] records five years after the President and Vice President leave office.”).

search fees will be charged for such records.<sup>9</sup> **Consequently, American Oversight expects that only reproduction fees will be incurred by this request. If NARA believes reproduction fees may exceed \$250 please contact American Oversight immediately.**

**Conclusion**

We share a common mission to promote transparency in government. American Oversight looks forward to working with NARA on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Beth France at [foia@americanoversight.org](mailto:foia@americanoversight.org) or 202.897.2465.

Sincerely,

A handwritten signature in blue ink, appearing to read "Austin Evers", with a long horizontal flourish extending to the left.

Austin Evers  
Executive Director  
American Oversight

---

<sup>9</sup> 36 C.F.R. § 1250.51(b).

# EXHIBIT C



February 22, 2019

**VIA ELECTRONIC MAIL**

Chief, Special Access and FOIA Staff (RD-F)  
8601 Adelphi Road, Room 5500  
College Park, MD 20740  
E-mail: [specialaccess.foia@nara.gov](mailto:specialaccess.foia@nara.gov)

George W. Bush Presidential Library and  
Museum  
c/o FOIA Coordinator  
2943 SMU Blvd.  
Dallas, TX 75205  
[gwbush.library@nara.gov](mailto:gwbush.library@nara.gov)

**Re: Expedited Freedom of Information Act Request**

Dear Chief and FOIA Coordinator:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, the Presidential Records Act (PRA), 44 U.S.C. § 2201 *et seq.*, and the implementing regulations of the National Archives and Records Administration (NARA), 36 C.F.R. Part 1250, American Oversight makes the following request for records of NARA and the George W. Bush Presidential Library and Museum (GWB Library).

**Requested Records**

American Oversight requests that the GWB Library provide access to the following records within twenty business days:

Any records of Neomi Rao, former Associate Counsel and Special Assistant to President George W. Bush, not already available on the GWB Library website,<sup>1</sup> including:

- Correspondence (including memoranda, letters, or emails) to or from Ms. Rao, or on which she was carbon copied or blind carbon copied, and attachments to such correspondence; and
- Records maintained by Ms. Rao in the course of her work for the White House Counsel's Office and/or as Special Assistant to the President, including memoranda

---

<sup>1</sup> Specifically, we note that records from Ms. Rao's staff files related to Brett Kavanaugh are available on the GWB Library's website. *See Records on Brett M. Kavanaugh*, George W. Bush Presidential Library and Museum, <https://www.georgewbushlibrary.smu.edu/Research/Digital-Library/BrettMKavanaughRecords>. American Oversight does not seek these records through this FOIA request.



to file, notes, meeting agendas, meeting summaries, or materials distributed in connection with meetings.

Please provide all records from March 1, 2005, through July 31, 2006.

Under the FOIA Improvement Act of 2016, agencies must adopt a presumption of disclosure, withholding information “only if . . . disclosure would harm an interest protected by an exemption” or “disclosure is prohibited by law.”<sup>2</sup> If it is your position that any portion of the requested records is exempt from disclosure, American Oversight requests that you provide an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974). As you are aware, a *Vaughn* index must describe each document claimed as exempt with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.”<sup>3</sup> Moreover, the *Vaughn* index “must describe *each* document or portion thereof withheld, and for *each* withholding it must discuss the consequences of disclosing the sought-after information.”<sup>4</sup> Further, “the withholding agency must supply ‘a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.’”<sup>5</sup>

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 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.<sup>6</sup> Claims of nonsegregability must be made with the same degree of detail as required for claims of exemptions in a *Vaughn* index. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner, and that extraneous costs are not incurred, 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 NARA can decrease the likelihood of costly and time-consuming litigation in the future.

### Fees

American Oversight recognizes that NARA does not grant fee waivers for reproduction of archival records or Presidential records subject to FOIA regulations<sup>7</sup> under the authority of 44 U.S.C. §

<sup>2</sup> FOIA Improvement Act of 2016 § 2 (Pub. L. No. 114-185).

<sup>3</sup> *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).

<sup>4</sup> *King v. U.S. Dep’t of Justice*, 830 F.2d 210, 223-24 (D.C. Cir. 1987) (emphases in original).

<sup>5</sup> *Id.* at 224 (citing *Mead Data Central, Inc. v. U.S. Dep’t of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)).

<sup>6</sup> *Mead Data Central*, 566 F.2d at 261.

<sup>7</sup> 36 C.F.R. § 1250.51(a); *see also* 36 C.F.R. § 1250.6(d) (“FOIA applies to [Presidential] records five years after the President and Vice President leave office.”).

2116, which allows the Archivist to “charge a fee set to recover the costs for making or authenticating copies or reproductions” of such records. However, NARA regulations state that no search fees will be charged for such records.<sup>8</sup> **Consequently, American Oversight expects that only reproduction fees will be incurred by this request. If NARA believes reproduction fees may exceed \$250, please contact American Oversight immediately.**

### Conclusion

We share a common mission to promote transparency in government. American Oversight looks forward to working with NARA on this request. If you do not understand any part of this request, have any questions, or foresee any problems in fully releasing the requested records, please contact Katherine Anthony at [foia@americanoversight.org](mailto:foia@americanoversight.org) or 202.897.3918.

Sincerely,

A handwritten signature in blue ink that reads "Austin Evers". The signature is fluid and cursive, with a long horizontal line extending to the left.

Austin Evers  
Executive Director  
American Oversight

---

<sup>8</sup> 36 C.F.R. § 1250.51(b).

# EXHIBIT D



January 20, 2026

**VIA EMAIL**

National Archives and Records Administration  
Archival Operations Division - Donald J. Trump Presidential Library  
8601 Adelphi Rd.  
College Park, MD 20740  
[trump.library@nara.gov](mailto:trump.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

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.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.<sup>1</sup> American Oversight seeks records with the potential to shed light on this matter.

**Requested Records**

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

All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by Senior Advisor for Policy Stephen Miller, or anyone communicating on his behalf, such as an assistant or scheduler, to any email address ending in .com, .co, .us, .net, .org, .mail, .edu, .law, .legal, .ch, .me, .group, .vc, or .io.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by Mr. Miller. To be clear, however, American Oversight's request encompasses complete email chains, including all preceding messages in a chain to which Mr. Miller responded. This means that any message Mr. Miller during the specified time frame to any email address ending in any of the domains listed above is responsive to this request, and all sent and received messages in that chain should be produced.

---

<sup>1</sup> See, e.g., Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, <https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/>.



**Please provide all responsive records from January 20, 2017, through January 20, 2021.**

### **Fee Waiver Standard**

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). 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 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.”<sup>2</sup> The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump’s first term.<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its 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 not primarily in the commercial interest of the requester.”<sup>4</sup> In fact, 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 commercial 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 X (formerly Twitter).<sup>5</sup>

---

<sup>2</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>3</sup> *See supra* note 1.

<sup>4</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>5</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jan. 16, 2026).

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>6</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration’s contacts with Ukraine and analyses of those contacts;<sup>7</sup> posting records and editorial content about the federal government’s response to the COVID-19 pandemic;<sup>8</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the first Trump Administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>9</sup> 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;<sup>10</sup> and posting records and analysis of federal officials’ use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>11</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

---

<sup>6</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>7</sup> *The Trump Administration’s Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>8</sup> See generally *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>9</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.

<sup>10</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>11</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo’s 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

- 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 X (formerly 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.
- 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 FOIA.<sup>12</sup>
- 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.

### **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. 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

---

<sup>12</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

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 Jessica Jensen at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (276) 293-9853 ext. 1033. 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,

/s/ Jessica Jensen

Jessica Jensen  
on behalf of  
American Oversight

# EXHIBIT E



January 20, 2026

**VIA EMAIL**

National Archives and Records Administration  
Archival Operations Division - Donald J. Trump Presidential Library  
8601 Adelphi Rd.  
College Park, MD 20740  
[trump.library@nara.gov](mailto:trump.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

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.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.<sup>1</sup> American Oversight seeks records with the potential to shed light on this matter.

**Requested Records**

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

All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by Director of Social Media Dan Scavino, or anyone communicating on his behalf, such as an assistant or scheduler, to any email address ending in .com, .co, .us, .net, .org, .mail, .edu, .law, .legal, .ch, .me, .group, .vc, or .io.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by Mr. Scavino. To be clear, however, American Oversight's request encompasses complete email chains, including all preceding messages in a chain to which Mr. Scavino responded. This means that any message Mr. Scavino during the specified time frame to any email address ending in any of the domains listed above is responsive to this request, and all sent and received messages in that chain should be produced.

---

<sup>1</sup> See, e.g., Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, <https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/>.



**Please provide all responsive records from January 20, 2017, through January 20, 2021.**

### **Fee Waiver Standard**

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). 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 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.”<sup>2</sup> The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump’s first term.<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its 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 not primarily in the commercial interest of the requester.”<sup>4</sup> In fact, 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 commercial 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 X (formerly Twitter).<sup>5</sup>

---

<sup>2</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>3</sup> *See supra* note 1.

<sup>4</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>5</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jan. 16, 2026).

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>6</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration’s contacts with Ukraine and analyses of those contacts;<sup>7</sup> posting records and editorial content about the federal government’s response to the COVID-19 pandemic;<sup>8</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the first Trump Administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>9</sup> 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;<sup>10</sup> and posting records and analysis of federal officials’ use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>11</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

<sup>6</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>7</sup> *The Trump Administration’s Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>8</sup> See generally *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>9</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.

<sup>10</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>11</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo’s 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

- 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 X (formerly 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.
- 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 FOIA.<sup>12</sup>
- 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.

### **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. 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

---

<sup>12</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

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 Jessica Jensen at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (276) 293-9853 ext. 1033. 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,

/s/ Jessica Jensen

Jessica Jensen  
on behalf of  
American Oversight

# EXHIBIT F



January 20, 2026

**VIA EMAIL**

National Archives and Records Administration  
Archival Operations Division - Donald J. Trump Presidential Library  
8601 Adelphi Rd.  
College Park, MD 20740  
[trump.library@nara.gov](mailto:trump.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

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.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.<sup>1</sup> American Oversight seeks records with the potential to shed light on this matter.

**Requested Records**

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

All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by Senior Advisor Jared Kushner, or anyone communicating on his behalf, such as an assistant or scheduler, to any email address ending in .com, .co, .us, .net, .org, .mail, .edu, .law, .legal, .ch, .me, .group, .vc, or .io.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by Mr. Kushner. To be clear, however, American Oversight's request encompasses complete email chains, including all preceding messages in a chain to which Mr. Kushner responded. This means that any message Mr. Kushner during the specified time frame to any email address ending in any of the domains listed above is responsive to this request, and all sent and received messages in that chain should be produced.

---

<sup>1</sup> See, e.g., Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, <https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/>.



**Please provide all responsive records from January 20, 2017, through January 20, 2021.**

### **Fee Waiver Standard**

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). 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 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.”<sup>2</sup> The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump’s first term.<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its 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 not primarily in the commercial interest of the requester.”<sup>4</sup> In fact, 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 commercial 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 X (formerly Twitter).<sup>5</sup>

---

<sup>2</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>3</sup> *See supra* note 1.

<sup>4</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>5</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jan. 16, 2026).

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>6</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration’s contacts with Ukraine and analyses of those contacts;<sup>7</sup> posting records and editorial content about the federal government’s response to the COVID-19 pandemic;<sup>8</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the first Trump Administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>9</sup> 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;<sup>10</sup> and posting records and analysis of federal officials’ use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>11</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

---

<sup>6</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>7</sup> *The Trump Administration’s Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>8</sup> See generally *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>9</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.

<sup>10</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>11</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo’s 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

- 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 X (formerly 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.
- 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 FOIA.<sup>12</sup>
- 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.

### **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. 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

---

<sup>12</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

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 Jessica Jensen at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (276) 293-9853 ext. 1033. 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,

/s/ Jessica Jensen

Jessica Jensen  
on behalf of  
American Oversight

# EXHIBIT G



January 20, 2026

**VIA EMAIL**

National Archives and Records Administration  
Archival Operations Division - Donald J. Trump Presidential Library  
8601 Adelphi Rd.  
College Park, MD 20740  
[trump.library@nara.gov](mailto:trump.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

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.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.<sup>1</sup> American Oversight seeks records with the potential to shed light on this matter.

**Requested Records**

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

All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by Domestic Policy Council Director Brooke Rollins, or anyone communicating on her behalf, such as an assistant or scheduler, to any email address ending in .com, .co, .us, .net, .org, .mail, .edu, .law, .legal, .ch, .me, .group, .vc, or .io.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by Ms. Rollins. To be clear, however, American Oversight's request encompasses complete email chains, including all preceding messages in a chain to which Ms. Rollins responded. This means that any message Ms. Rollins during the specified time frame to any email address ending in any of the domains listed above is responsive to this request, and all sent and received messages in that chain should be produced.

---

<sup>1</sup> See, e.g., Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, <https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/>.



**Please provide all responsive records from January 20, 2017, through January 20, 2021.**

### **Fee Waiver Standard**

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). 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 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.”<sup>2</sup> The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump’s first term.<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its 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 not primarily in the commercial interest of the requester.”<sup>4</sup> In fact, 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 commercial 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 X (formerly Twitter).<sup>5</sup>

---

<sup>2</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>3</sup> *See supra* note 1.

<sup>4</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>5</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jan. 16, 2026).

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>6</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration’s contacts with Ukraine and analyses of those contacts;<sup>7</sup> posting records and editorial content about the federal government’s response to the COVID-19 pandemic;<sup>8</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the first Trump Administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>9</sup> 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;<sup>10</sup> and posting records and analysis of federal officials’ use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>11</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

---

<sup>6</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>7</sup> *The Trump Administration’s Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>8</sup> See generally *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>9</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.

<sup>10</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>11</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo’s 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

- 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 X (formerly 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.
- 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 FOIA.<sup>12</sup>
- 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.

### **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. 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

---

<sup>12</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

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 Jessica Jensen at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (276) 293-9853 ext. 1033. 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,

/s/ Jessica Jensen

Jessica Jensen  
on behalf of  
American Oversight

# EXHIBIT H



January 20, 2026

**VIA EMAIL**

National Archives and Records Administration  
Archival Operations Division - Donald J. Trump Presidential Library  
8601 Adelphi Rd.  
College Park, MD 20740  
[trump.library@nara.gov](mailto:trump.library@nara.gov)

**Re: Freedom of Information Act Request**

Dear FOIA Officer:

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.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.<sup>1</sup> American Oversight seeks records with the potential to shed light on this matter.

**Requested Records**

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

All email communications (including emails, complete email chains, calendar invitations, and attachments thereto) sent by Senior Advisor Ivanka Trump, or anyone communicating on her behalf, such as an assistant or scheduler, to any email address ending in .com, .co, .us, .net, .org, .mail, .edu, .law, .legal, .ch, .me, .group, .vc, or .io.

In an effort to accommodate your office and reduce the number of potentially responsive records to be processed and produced, American Oversight has limited this request to emails sent by Ms. Trump. To be clear, however, American Oversight's request encompasses complete email chains, including all preceding messages in a chain to which Ms. Trump responded. This means that any message Ms. Trump during the specified time frame to any email address ending in any of the domains listed above is responsive to this request, and all sent and received messages in that chain should be produced.

---

<sup>1</sup> See, e.g., Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, <https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/>.



**Please provide all responsive records from January 20, 2017, through January 20, 2021.**

### **Fee Waiver Standard**

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). 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 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.”<sup>2</sup> The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump’s first term.<sup>3</sup> Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its 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 not primarily in the commercial interest of the requester.”<sup>4</sup> In fact, 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 commercial 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 X (formerly Twitter).<sup>5</sup>

---

<sup>2</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>3</sup> *See supra* note 1.

<sup>4</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>5</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jan. 16, 2026).

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>6</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration’s contacts with Ukraine and analyses of those contacts;<sup>7</sup> posting records and editorial content about the federal government’s response to the COVID-19 pandemic;<sup>8</sup> posting records received as part of American Oversight’s “Audit the Wall” project to gather and analyze information related to the first Trump Administration’s proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>9</sup> 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;<sup>10</sup> and posting records and analysis of federal officials’ use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>11</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **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:

<sup>6</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>7</sup> *The Trump Administration’s Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>8</sup> See generally *The Trump Administration’s Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>9</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.

<sup>10</sup> *DOJ Records Relating to Solicitor General Noel Francisco’s Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>11</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo’s 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

- 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 X (formerly 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.
- 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 FOIA.<sup>12</sup>
- 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.

### **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. 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

---

<sup>12</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

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 Jessica Jensen at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (276) 293-9853 ext. 1033. 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,

/s/ Jessica Jensen

Jessica Jensen  
on behalf of  
American Oversight