



May 22, 2026

VIA Electronic Delivery

Department of the Interior
Office of the Secretary, FOIA Office
1849 C St., NW, MS-7328, MIB
Washington, DC 20240
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Department of the Interior ("DOI") produce the following within twenty (20) business days:

1. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) between (a) the DOI officials identified below and (b) any of the external domains identified below.

Agency Officials:

1. Doug Burgum, Secretary
2. Kate MacGregor, Deputy Secretary
3. JoDee Hanson, Chief of Staff
4. Anyone serving as Senior Counselor
5. Anyone serving as Senior Advisor to the Secretary
6. Deidre Kohlrus, Office of External and Intergovernmental Affairs Director
7. Daniel Gustafson, Office of External Affairs Deputy Director
8. Loganathan Naidu, Office of Intergovernmental Affairs Deputy Director
9. The senior most coordinating department efforts on Freedom 250*

External Entities and Individuals:

DFF-DOI-26-0755

- a. Anyone communicating on behalf of Freedom 250, including anyone with an email address ending in [@freedom250.org](mailto:freedom250.org)
- b. Anyone communicating on behalf of the America 250 Commission, including anyone with an email address ending in [@america250.org](mailto:america250.org)
- c. Anyone communicating on behalf of the National Park Foundation, including anyone with an email address ending in [@nationalparks.org](mailto:nationalparks.org)
- d. Keith Krach, Freedom 250 Chief Executive Officer
- e. Rachel Gerli, Freedom 250 Chief Partnerships Officer
- f. Caleb Bonham, Freedom 250 Advisor to the CEO
- g. Danielle Madda, Freedom 250 Chief of Staff
- h. Allison Rant, Freedom 250 Vice President of Strategic Partnerships
- i. David Bohigian, Freedom 250 Network Chair
- j. Danielle Alvarez, Freedom 250 Spokesperson
- k. Elizabeth Pipko, Freedom 250 Spokesperson
- l. Rachel Reisner, Freedom 250 Spokesperson
- m. Maria Papakonstantinou, Freedom 250 Spokesperson
- n. Vince Haley, Director of the Domestic Policy Council of the United States
- o. Monica Crowley, Ambassador and Chief of Protocol
- p. Brittany Baldwin, Task Force 250 Senior Policy Adviser
- q. Kellyanne Conway
- r. Meredith O'Rourke

Please note that this request does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if Secretary Burgum received a mass-distribution news clip email from the Freedom 250 that initial email would not be responsive to this request. However, if Secretary Burgum forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

2. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) sent by (a) any of the DOI officials identified below to (b) any email addresses ending in .com, .org, .net, .edu, .us, or .law containing (c) any of the following key terms.

Agency Officials:

1. Doug Burgum, Secretary
2. Kate MacGregor, Deputy Secretary
3. JoDee Hanson, Chief of Staff

4. Anyone serving as Senior Counselor
5. Anyone serving as Senior Advisor to the Secretary
6. Deidre Kohlrus, Office of External and Intergovernmental Affairs Director
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Key Terms:

- a. A250
- b. “A 250”
- c. America250
- d. “America 250”
- e. F250
- f. “F 250”
- g. Freedom250
- h. “Freedom 250”
- i. Semiquincentennial
- j. “Task Force 250”
- k. “250th anniversary”
- l. “250th birthday”

In an effort to accommodate DOI and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the included agency officials. To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both the included agency officials' response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the DOI official's signature block.

*Given that your agency is in coordination with the Freedom 250 commission, a responsive search would require inquiring with a subject matter expert--particularly someone involved with the agency's work with the council--to determine relevant responsive agency officials.¹

¹ See, e.g., U.S. Department of the Interior, *Freedom 250*, (Accessed Mar. 16, 2026), <https://www.doi.gov/freedom250>.

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.² When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

³ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled ‘Regulation Extermination’ Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=tr>

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

[ue](https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison); Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn *et al.*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-advisor-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



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Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the Department of the Interior (“DOI”) produce the following within twenty (20) business days:

All final documents or memoranda related to funding allocation or decisions regarding America 250 and Freedom 250 (including Freedom 250 LLC) in possession of the Department.

Responsive records should include, but not be limited to, budget justification documentation or memoranda delineating the funding America 250 and Freedom 250 would receive (and changes to the distribution of funds); documents reflecting grant transfers related to funding America 250 or Freedom 250 events; memoranda approving budgets related to America 250 and Freedom 250 events and expenses; documents aggregating all budget expenses related to America 250 and Freedom 250 events and expenses.

Given that your agency is in coordination with the Freedom 250 commission, a responsive search may require inquiring with a subject matter expert--particularly someone involved with the agency's work with the commission--to determine relevant responsive agency officials.¹

¹ See, e.g., U.S. Department of the Interior, *Freedom 250*, (Accessed Mar. 16, 2026), <https://www.doi.gov/freedom250>.

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

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Request for Fee Waiver

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In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.² When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

³ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled ‘Regulation Extermination’ Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniur Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

<https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn *et al.*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-advisor-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



May 22, 2026

VIA Electronic Delivery

U. S. Department of State
Information Access Liaison Office, A/SKS/IAP/IAL
2201 C Street N.W., Suite B266
Washington, D.C. 20520-0000
Via Online Portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the Department of State (“State”) produce the following within twenty (20) business days:

1. Any guidance or directives sent by Department leadership regarding the solicitation and the acceptance of foreign donations for Freedom 250 or America 250.¹
2. Records sufficient to identify the number, size, and source of donations for Freedom 250 or America 250 raised by U.S. embassies and consulates.
3. Records sufficient to identify how funds raised by U.S. embassies and consulates for the Semiquincentennial are being allocated within the State Department or transferred to other entities including but not limited to Freedom 250 LLC, America 250, National Park Foundation, National Park Service, Department of Interior.

A responsive search may require inquiring with a subject matter expert--particularly someone involved with Freedom 250 or America 250 including the Office of the Secretary, Office of Legal Adviser, and Under Secretary for Political Affairs--to determine responsive records.

¹ See, e.g., Alexandra Stevenson *et al.*, *Like Trump, U.S. Embassies Are Raising Cash for Lavish July Fourth Parties*, *The New York Times* (Feb. 15, 2026), <https://www.nytimes.com/2026/02/15/business/trump-july-fourth-singapore-japan.html>.

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.² When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

³ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled ‘Regulation Extermination’ Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=tr>

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

[ue](https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison); Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn *et al.*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-advisor-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



May 22, 2026

VIA Electronic Delivery

U. S. Department of State
Information Access Liaison Office, A/SKS/IAP/IAL
2201 C Street N.W., Suite B266
Washington, D.C. 20520-0000
Via Online Portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the Department of State (“State”) produce the following within twenty (20) business days:

1. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) between (a) Ambassador and Chief of Protocol Monica Crowley and (b) any of the external entities identified below.

External Entities and Individuals:

- a. Anyone communicating on behalf of the Freedom 250 Commission, including anyone with an email address ending in @freedom250.org
- b. Anyone communicating on behalf of the America 250 Commission, including anyone with an email address ending in @america250.org
- c. Anyone communicating on behalf of the National Park Foundation, including anyone with an email address ending in @nationalparks.org
- d. Keith Krach, Freedom 250 Chief Executive Officer
- e. Rachel Gerli, Freedom 250 Chief Partnerships Officer
- f. Caleb Bonham, Freedom 250 Advisor to the CEO
- g. Danielle Madda, Freedom 250 Chief of Staff
- h. Allison Rant, Freedom 250 Vice President of Strategic Partnerships

- i. David Bohigian, Freedom 250 Network Chair
- j. Danielle Alvarez, Freedom 250 Spokesperson
- k. Elizabeth Pipko, Freedom 250 Spokesperson
- l. Rachel Reisner, Freedom 250 Spokesperson
- m. Maria Papakonstantinou, Freedom 250 Spokesperson
- b. Vince Haley, Director of the Domestic Policy Council of the United States
- c. Brittany Baldwin, Task Force 250 Senior Policy Adviser
- d. Kellyanne Conway
- e. Meredith O'Rourke

Please note that this request does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if Secretary Burgum received a mass-distribution news clip email from the Freedom 250 that initial email would not be responsive to this request. However, if Secretary Burgum forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

2. All email communications (including email messages, complete email chains, email attachments, calendar invitation) sent by (a) Ambassador and Chief of Protocol Monica Crowley to (b) any email addresses ending in .com, .org, .net, .edu, .us, or .law containing (c) any of the following key terms:

Key Terms:

- a. A250
- b. "A 250"
- c. America250
- d. "America 250"
- e. F250
- f. "F 250"
- g. Freedom250
- h. "Freedom 250"
- i. Semiquincentennial
- j. "Task Force 250"
- k. "250th anniversary"
- l. "250th birthday"

In an effort to accommodate State and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the included agency officials. To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received

messages. This means, for example, that both the included agency officials' response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the State official's signature block.

This request seeks records from May 30, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are

¹ See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

²See, e.g., Matt Braken, *DOGE Pitched AI-Fueled 'Regulation Extermination' Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yunior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz et al. "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn et al, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-eps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed*

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ *Skye Perryman*

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

Them, BuzzFeed News (Mar. 22, 2018),

<https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at

<https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017),

<https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.



May 22, 2026

VIA Electronic Delivery

Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590
ost.foia@dot.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Department of Transportation ("DOT") produce the following within twenty (20) business days:

1. All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Signal, WhatsApp, Slack and Microsoft Teams, and direct messages on social media platforms such as X and Truth Social) between (a) the DOT officials included below and (b) any of the external individuals included below.

Agency officials:

1. Sean Duffy, Secretary
2. Steven Bradbury, Deputy Secretary
3. Charles "Pete" Meachum, Chief of Staff
4. Anyone serving as Executive Assistant or Scheduler to the Secretary
5. Gregory Zerzan, General Counsel
6. Luisa Guerra-Young, Deputy Assistant Secretary for Transportation Policy
7. Anyone serving as Assistant Secretary or Acting Assistant Secretary for Governmental Affairs

External Entities:

- a. Anyone communicating on the behalf of American Road Trip Inc, including any email address ending in (@greatamericanroadtrip.org)

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- b. Anyone communicating on the behalf of Bunim Murray Productions, including any email address ending in (@bunim-murray.com)
- c. Victoria (Tori) Barnes (vbarnes@greatamericanroadtrip.org)
- d. Anyone communicating on behalf of the Freedom 250 Commission, including anyone with an email address ending in @freedom250.org
- e. Anyone communicating on behalf of the America 250 Commission, including anyone with an email address ending in @america250.org

Please note that this request does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if one of the included DOT officials received a mass-distribution news clip email from American Road Trip Inc. that initial email would not be responsive to this request. However, if said official forwarded that email to another individual with their own commentary, that subsequent message would be responsive to this request and should be produced.

- 2. All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Signal, WhatsApp, Slack and Microsoft Teams, and direct messages on social media platforms such as X and Truth Social) sent by (a) any of the DOT officials included in Item 1 to (b) any email addresses ending in .com, .org, .net, .edu, .us, or .law containing (c) any of the following key terms.

Key Terms:

- a. A250
- b. “A 250”
- c. America250
- d. “America 250”
- e. ART
- f. Boeing
- g. “Bunim Murray”
- h. Bunim/Murray
- i. F250
- j. “F 250”
- k. Freedom250
- l. “Freedom 250”
- m. GART
- n. “Great American”
- o. “Road trip”
- p. Roadtrip
- q. Semiquincentennial

- r. Shell
- s. "Tori Barnes"
- t. Toyota
- u. "United Airlines"
- v. "Task Force 250"
- w. "250th anniversary"
- x. "250th birthday"

In an effort to accommodate DOT and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the included agency officials. To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both the included agency officials' response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the DOT official's signature block.

This request seeks records from September 1, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute to the public’s understanding of potential conflicts of interest surrounding Secretary Duffy’s participation in an

industry funded reality-show family road trip.¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

¹ See, e.g., Megan O’Matz, *Transportation Lobbyists Have Donated Thousands to Sean Duffy’s Son-in-Law as He Runs for Congress*, ProPublica (Mar. 18, 2026),

<https://www.propublica.org/article/sean-duffy-michael-alfonso-congress-transportation>; Michael Scherer, *Trump’s Cozy Transportation Secretary*, The Atlantic (Apr. 2, 2026),

<https://www.theatlantic.com/politics/2026/04/trump-sean-duffy-transportation-ethics/686649/>.

² See, e.g., Matt Braken, *DOGE Pitched AI-Fueled ‘Regulation Extermination’ Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniors Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026),

<https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026),

<https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026),

<https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. marshals waived training rules for Musk’s armed DOGE security, emails show*, NBC News (Apr. 6, 2026),

<https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump’s Attack on the Fed*, The Free Press (Jan. 20, 2026),

<https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025),

<https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019),

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https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018),

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<https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018),

<https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

<https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

May 22, 2026

VIA Electronic Delivery

Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590
ost.foia@dot.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the Department of Transportation (“DOT”) produce the following within twenty (20) business days:

All records reflecting ethics guidance (via memorandum, email, or orally (as reflected in preparatory notes, written summaries of oral communications, or talking points)) provided by the Department of Transportation’s Office of General Counsel (“OGC”) to Secretary Sean Duffy regarding any matters related to the “Great American Road Trip.”¹

This request seeks records from September 1, 2025 until the date of the search.

¹ See, e.g., Amelia Benavides-Colón, *Sean Duffy Teams Up With ‘Real World’ Producers to Create YouTube Series*, NOTUS (Mar. 30, 2026), <https://www.notus.org/media/sean-duffy-real-world-producers-youtube-series-america-250>; Julia Benbrook, *Transportation Secretary Sean Duffy Returns to Reality TV Roots, Speaking Criticism and Questions*, CNN (May 9, 2026), <https://www.cnn.com/2026/05/09/politics/sean-duffy-road-trip-tv-show>; Uwa Ede-Osifo, *Sean Duffy Faces Backlash for New Family Reality Show: ‘Unfocused and Out of Touch,’* The Guardian (May 9, 2026), <https://www.theguardian.com/us-news/2026/may/09/sean-duffy-great-american-road-trip-reality-show>; Zachary Folk, *Sean Duffy Slammed Over Road Trip Reality Show Filmed Over Seven Months*, Forbes (May 10, 2026), <https://www.forbes.com/sites/zacharyfolk/2026/05/10/sean-duffy-slammed-over-7-month-filming-timeframe-of-road-trip-reality-show/>; Chris Marquette *et al.*, *Would-Be Sponsor Balked At Paying For Sean Duffy’s Tour Across America*, Politico (May 16, 2026), <https://www.politico.com/news/2026/05/16/duffy-road-trip-ethics-00924876>; Nikki McCann Ramirez, *How Much Would It Cost to Fuel Sean Duffy’s Reality Show Road Trip?*, RollingStone (May 12, 2026), <https://www.rollingstone.com/politics/politics-features/sean-duffy-great-american-road-trip-gas-1235560769/>; Rachel Treisman, *Transportation Secretary Duffy Filmed a Reality Show, Funded by Firms He Regulates*, NPR (May 12, 2026), <https://www.npr.org/2026/05/12/nx-s1-5818190/sean-duffy-road-trip-reality-show-sponsors>.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*,

799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute to the public’s understanding of potential conflicts of interest surrounding Secretary Duffy’s participation in an industry funded reality-show family road trip.² When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Megan O’Matz, *Transportation Lobbyists Have Donated Thousands to Sean Duffy’s Son-in-Law as He Runs for Congress*, ProPublica (Mar. 18, 2026),

<https://www.propublica.org/article/sean-duffy-michael-alfonso-congress-transportation>; Michael Scherer, *Trump’s Cozy Transportation Secretary*, The Atlantic (Apr. 2, 2026), <https://www.theatlantic.com/politics/2026/04/trump-sean-duffy-transportation-ethics/686649/>.

³ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled ‘Regulation Extermination’ Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yunion Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026),

<https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. marshals waived training rules for Musk’s armed DOGE security, emails show*, NBC News (Apr. 6, 2026),

<https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump’s Attack on the Fed*, The Free Press (Jan. 20, 2026),

<https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce*

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Secretary Wilbur Ross?, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al* “Happy to Do It”: Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn *et al*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees’ war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



May 22, 2026

VIA Electronic Delivery

General Services Administration
FOIA Contact, FOIA Requester Service Center (LG)
1800 F. Street, NW
Washington, DC 20405
gsa.foia@gsa.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the General Services Administration (“GSA”) produce the following within twenty (20) business days:

1. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) between (a) the GSA officials identified below and (b) any of the external domains identified below.

Agency Officials:

1. Edward Forst, Administrator
2. Michael Lynch, Deputy Administrator
3. Anyone serving as Chief of Staff, including Jillian Wyant
4. Anyone serving as Deputy Chief of Staff, including Corey Cooke

External Entities:

- a. Anyone communicating on behalf of the Freedom 250 Commission, including anyone with an email address ending in @freedom250.org
- b. Anyone communicating on behalf of the America 250 Commission, including anyone with an email address ending in @america250.org
- c. Keith Krach, Freedom 250 Chief Executive Officer

- d. Rachel Gerli, Freedom 250 Chief Partnerships Officer
- e. Caleb Bonham, Freedom 250 Advisor to the CEO
- f. Danielle Madda, Freedom 250 Chief of Staff
- g. Allison Rant, Freedom 250 Vice President of Strategic Partnerships
- h. David Bohigian, Freedom 250 Network Chair
- i. Danielle Alvarez, Freedom 250 Spokesperson
- j. Elizabeth Pipko, Freedom 250 Spokesperson
- k. Rachel Reisner, Freedom 250 Spokesperson
- l. Maria Papakonstantinou, Freedom 250 Spokesperson
- m. Vince Haley, Director of the Domestic Policy Council of the United States
- n. Brittany Baldwin, Task Force 250 Senior Policy Adviser
- o. Kellyanne Conway
- p. Meredith O'Rourke

Please note that this request does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if one of the included GSA officials received a mass-distribution news clip email from the Freedom 250 that initial email would not be responsive to this request. However, if said official forwarded that email to another individual with their own commentary, that subsequent message would be responsive to this request and should be produced.

- 2. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) sent by (a) any of the GSA officials identified in Item 1 to (b) any email addresses ending in .com, .org, .net, .edu, .us, or .law containing (c) any of the following key terms.

Key Terms:

- a. A250
- b. "A 250"
- c. America250
- d. "America 250"
- e. F250
- f. "F 250"
- g. Freedom250
- h. "Freedom 250"
- i. Semiquincentennial
- j. "Task Force 250"
- k. "250th anniversary"

1. “250th birthday”

In an effort to accommodate GSA and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the included agency officials. To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both the included agency officials' response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the GSA official's signature block.

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. §

552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.¹

¹ See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026),

When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

<https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026),

<https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, *The New York Times* (Feb. 8, 2026),

<https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

²See, e.g., Matt Braken, *DOGE Pitched AI-Fueled 'Regulation Extermination' Tool to HUD*, *FedScoop* (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yunion Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, *Democracy Docket* (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, *Lever News* (Apr. 21, 2026),

<https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, *NOTUS* (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison/>;

David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, *NBC News* (Apr. 6, 2026),

<https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, *The Free Press* (Jan. 20, 2026),

<https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, *Reuters* (Dec. 22, 2025),

<https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, *Yahoo News* (May 14, 2019),

<https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, *ProPublica* (Mar. 27, 2019),

<https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>;

Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, *Buzzfeed News* (Feb. 28, 2019),

<https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>;

Jonathan Cohn *et al.*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, *Huffpost* (Dec. 17, 2018),

https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba;

Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, *Mother Jones* (Dec. 7, 2018),

<https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* *Business Insider* (Nov. 2, 2018),

<https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, *HuffPost* (Oct. 31, 2018),

https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, *USA Today* (Oct. 1, 2018),

<https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, *Newsweek* (Aug. 29, 2018),

<https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, *Buzzfeed News* (July 25, 2018),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

<https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

May 22, 2026

VIA Electronic Delivery

Freedom of Information Act Officer
Institute of Museum and Library Services
955 L'Enfant Plaza North, SW, Suite 4000
Washington, DC, 20024-2135

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the Institute of Museum and Library Services (“IMLS”) produce the following within twenty (20) business days:

1. Records sufficient to identify the agency officials who reviewed and/or approved the transferring of grant funding originally awarded to [America250.org](https://www.america250.org) to the National Park Foundation for “Freedom 250.”¹
2. All justification and approval documents to support the transferring of grant funding originally awarded to [America250.org](https://www.america250.org) to the National Park Foundation for “Freedom 250.”²
3. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) sent by Acting IMLS Director Keith Sonderling and anyone serving as his Chief of Staff to (b) any email addresses ending in .com, .org, .net, .edu, .us, or .law containing (c) any of the following key terms.

¹ See, e.g., Institute of Library and Museum Services, *National Park Foundation*, (Accessed May 18, 2026), <https://www.imls.gov/grants/awarded/lg-259279-ols-25-1>; USAspending, *LG-259279-OLS-25A*, (Dec. 23, 2025), https://www.usaspending.gov/award/ASST_NON_LG-259279-OLS-25A_474.

² See, e.g., Institute of Library and Museum Services, *Id.*

Key Terms

- a. A250
- b. "A 250"
- c. America250
- d. "America 250"
- e. F250
- f. "F 250"
- g. Freedom250
- h. "Freedom 250"
- i. "Freedom Trucks"
- j. Semiquincentennial
- k. "Task Force 250"
- l. "250th anniversary"
- m. "250th birthday"

In an effort to accommodate the IMLS and reduce the number of potentially responsive records to be processed and produced, DFF has limited this request to communications sent by Acting Director Sonderling. To be clear, however, we still request that complete email chains be produced, displaying both sent and received messages. This means, for example, that both Acting Director Sonderling's response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the IMLS official's signature block.

This request seeks records from November 1, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request

that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843

F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public's understanding of the government's handling of this nation's 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.³ When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.⁴

³ See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America's 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America's 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America's 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

⁴ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled 'Regulation Extermination' Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extinction-tool-to-hud/>; Yunior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymatters.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-extinction/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>;

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

Jonathan Cohn *et al*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba;
Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



May 22, 2026

VIA Electronic Delivery

National Park Service
1849 C Street, Room 2229
Washington DC, 20240
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation (“DFF”) requests that the National Park Service (“NPS”) produce the following within twenty (20) business days:

1. A complete copy of the full cooperative agreement between National Park Foundation and National Park Service under which “NPF distributes federal funds to Freedom 250 LLC only for NPS-approved events and only from budgets reviewed and approved by NPS.”¹
2. Records reflecting all events and expenses approved by NPS to receive Freedom 250 funds via the Freedom 250 LLC. To the extent that NPS has this information in aggregated form, such as a spreadsheet or budget document delineating names of events and corresponding expenses, the requester would accept this aggregated response for this portion of the request.
3. All final memoranda related to funding allocation or decisions regarding America 250 and Freedom 250 (including Freedom 250 LLC) in possession of NPS.

Given that your agency is in an official partnership with the National Park Foundation, which is housing Freedom 250, a responsive search would require inquiring with a subject matter expert--particularly someone involved with the agency’s work with the

¹ See, e.g., National Park Foundation, *Freedom 250 FAQs*, (Accessed May 21, 2026, 12:56 PM), <https://www.nationalparks.org/freedom-250-faqs>.

National Park Foundation and Freedom 250--to determine relevant responsive agency officials.²

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be

² *See, e.g., National Park Foundation, Id.*

furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of the government’s handling of this nation’s 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.³ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their

³ See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America’s 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America’s 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America’s 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.⁴

⁴See, e.g., Matt Braken, *DOGE Pitched AI-Fueled 'Regulation Extermination' Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yunior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymocket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz et al. "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn et al, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

President and CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

<https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-fundin-g-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.



May 22, 2026

VIA Electronic Delivery

National Park Service
1849 C Street, Room 2229
Washington DC, 20240
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the National Park Service ("NPS") produce the following within twenty (20) business days:

1. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) between (a) the NPS officials identified below and (b) any of the external domains identified below.

Agency Officials:

1. Anyone serving as National Park Service Director or Acting Director, including Jessica Bowron
2. Anyone serving as Deputy Director of Operations or Acting Deputy Director, including Frank Lands
3. Anyone serving as Chief of Staff to the Director or Acting Director, including Susan Farinelli
4. Joy Beasley, Cultural Resources, Partnerships and Science Associate Director
5. Stephan Noefield, Partnerships and Civic Engagement Acting Associate Director
6. The senior most coordinating department efforts on Freedom 250*

External Entities and Individuals:

- a. Anyone communicating on behalf of the Freedom 250 Commission, including anyone with an email address ending in [@freedom250.org](mailto:freedom250.org)
- b. Anyone communicating on behalf of the America 250 Commission, including anyone with an email address ending in [@america250.org](mailto:america250.org)
- c. Anyone communicating on behalf of the National Parks Foundation, including anyone with an email address ending in [@nationalparks.org](mailto:nationalparks.org)
- d. Keith Krach, Freedom 250 Chief Executive Officer
- e. Rachel Gerli, Freedom 250 Chief Partnerships Officer
- f. Caleb Bonham, Freedom 250 Advisor to the CEO
- g. Danielle Madda, Freedom 250 Chief of Staff
- h. Allison Rant, Freedom 250 Vice President of Strategic Partnerships
- i. David Bohigian, Freedom 250 Network Chair
- j. Danielle Alvarez, Freedom 250 Spokesperson
- k. Elizabeth Pipko, Freedom 250 Spokesperson
- l. Rachel Reisner, Freedom 250 Spokesperson
- m. Maria Papakonstantinou, Freedom 250 Spokesperson
- n. Vince Haley, Director of the Domestic Policy Council of the United States
- o. Brittany Baldwin, Task Force 250 Senior Policy Adviser
- p. Kellyanne Conway
- q. Meredith O'Rourke

Please note that this request does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if one of the officials included in the request received a mass-distribution news clip email from Freedom 250 that initial email would not be responsive to this request. However, if said official forwarded that email to another individual with their own commentary, that subsequent message would be responsive to this request and should be produced.

2. All electronic communications (including email messages, complete email chains, email attachments, calendar invitations, text messages, messages on messaging platforms such as Signal and WhatsApp, and direct messages on social media platforms such as X and Truth Social) sent by (a) any of the NPS officials identified in Item 1 containing (b) any of the following key terms.

Key Terms:

- a. A250
- b. "A 250"
- c. America250
- d. "America 250"
- e. F250

- f. “F 250”
- g. Freedom250
- h. “Freedom 250”
- i. Semiquincentennial
- j. “Task Force 250”
- k. “250th anniversary”
- l. “250th birthday”

In an effort to accommodate the NPS and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the included agency officials. To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both the included agency officials' response to an email and the initial received message are responsive to this request and should be produced.

We understand that some government officials have added terms related to the Semiquincentennial to their signature block. When searching for responsive records, please exclude emails where the relevant key terms only appear within the NPS official's signature block.

Given that your agency is in an official partnership with the National Park Foundation, who is housing Freedom 250, a responsive search would require inquiring with a subject matter expert--particularly someone involved with the agency's work with the National Parks Foundation and Freedom 250--to determine relevant responsive agency officials.¹

This request seeks records from January 29, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request

¹ *See, e.g.*, U.S. Department of the Interior, *Freedom 250*, (Accessed Mar. 16, 2026), <https://www.doi.gov/freedom250>.

that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843

F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public's understanding of the government's handling of this nation's 250th birthday celebrations, including the funneling of an undisclosed amount of government funds into a private group.² When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Gary Fields *et al.*, *Potential Conflicts Over Celebrating America's 250th Anniversary Spill Out in Congressional Hearing*, Associated Press (Feb. 10, 2026), <https://apnews.com/article/america-250-congress-spending-history-trump-9163856922b428f53a8e1a7c30a06a04>; Dan Friedman, *Trump Begins Branding America's 250th Anniversary as a Christian Celebration*, Mother Jones (May 17, 2026), <https://www.motherjones.com/politics/2026/05/trump-maga-freedom250-christian/>; Ben Smith, *Inside the Scramble to Keep a Divided America's 250 Birthday on Track*, SEMAFOR (Jan. 12, 2026), <https://www.semafor.com/article/01/12/2026/inside-the-scramble-to-keep-a-divided-americas-250th-birthday-on-track>; USA House Davos 2026, *USA House Davos Live Stream*, Youtube (Jan. 19, 2026), <https://www.youtube.com/watch?v=ulZDH0Y1d4Q>; Kenneth Vogel *et al.*, *For \$1 Million, Donors to U.S.A. Birthday Group Offered Access to Trump*, The New York Times (Feb. 8, 2026), <https://www.nytimes.com/2026/02/08/us/politics/freedom-250-trump-donors.html>.

³ See, e.g., Matt Braken, *DOGE Pitched AI-Fueled 'Regulation Extermination' Tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extinction-tool-to-hud/>; Yunion Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymatters.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster *et al.*, *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-extinction/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram *et al.*, *U.S. marshals waived training rules for Musk's armed DOGE security, emails show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice *et al.*, *Exclusive: Trump Appointee Inspired By Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz *et al.* "Happy to Do It": *Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>;

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by DFF as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

Jonathan Cohn *et al*, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

/s/ Skye Perryman

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