



1600 20th Street, NW • Washington, D.C. 20009 • 202/588-1000 • www.citizen.org

April 28, 2026

VIA ELECTRONIC SUBMISSION

OSD/JS FOIA Requester Service Center

Office of Freedom of Information

1155 Defense Pentagon

Washington, DC 20301-1155

RE: Freedom of Information Act Request

Dear Sir or Madam:

Definitions

As used in this request, “**the Visit**” refers to the April 27, 2026 visit by Robert James Ritchie, known as “Kid Rock,” to Fort Belvoir, Virginia, and the flights on or about that date of one or more AH-64 Apache helicopters operating from or at Fort Belvoir during which Mr. Ritchie and/or Secretary Hegseth were aboard, as well as the planning, scheduling, authorization, conduct, and aftermath thereof.

“**Communications**” includes, without limitation, electronic mail (including attachments); text messages and SMS/MMS messages; messages sent via Signal, WhatsApp, iMessage, or any other end-to-end-encrypted or auto-deleting messaging application; direct messages on social-media platforms; voicemails; written letters and memoranda; handwritten notes; calendar entries and meeting invitations; and any record reflecting a telephonic, in-person, or video-conference communication (such as call logs, meeting agendas, read-ahead memoranda, or briefing materials).

“**Records**” should be construed to include any responsive material in the possession, custody, or control of the Office of the Secretary of Defense or the Joint Staff, regardless of whether the record is stored on a government-issued device, government email or messaging account, personal device, or personal account, where the record was created, received, or used in the course of official agency business. *See* Competitive Enterprise Inst. v. Office of Sci. & Tech. Policy, 827 F.3d 145 (D.C. Cir. 2016).

“**Senior OSD Personnel**” refers to (a) the Secretary of Defense; (b) the Deputy Secretary of Defense; (c) the Chief of Staff and any Deputy Chief of Staff to the Secretary of Defense; (d) the Senior Military Assistant and any Junior Military Assistant or aide-de-camp to the Secretary of Defense; (e) any senior advisor or counselor to the Secretary of Defense; (f) any scheduler or

trip-coordinator for the Secretary of Defense; (g) the Pentagon Press Secretary, the Assistant to the Secretary of Defense for Public Affairs, and Deputy Assistants to the Secretary of Defense for Public Affairs; and (h) any attorney in the Office of the General Counsel of the Department of Defense who advised on the Visit.

Records Requested

Subject to the foregoing definitions, and for the period beginning March 1, 2026 through the date your office conducts its search, please provide:

1. All **Communications** sent or received by Secretary of Defense Pete Hegseth concerning the Visit.
2. All **Communications** sent or received by any other **Senior OSD Personnel** concerning the Visit.
3. All **Communications** between any **Senior OSD Personnel** and Robert James Ritchie, or any representative, agent, manager, attorney, family member, security personnel, or employee of Robert James Ritchie, concerning the Visit.
4. All **Communications** between any **Senior OSD Personnel** and any officer, employee, or contractor of the Department of the Army concerning the Visit.
5. All **Communications** between any **Senior OSD Personnel** and any official, employee, or contractor of the Executive Office of the President (including the White House, the National Security Council, and the Office of the Vice President) concerning the Visit.
6. All **Communications** between any **Senior OSD Personnel** and any non-government third party (other than persons described in Item 3 above) concerning the Visit, including but not limited to journalists, public-relations or political consultants, lobbyists, donors, and elected officials or congressional staff.
7. All calendar entries, meeting invitations, schedules, trip itineraries, advance memoranda, “trip book” materials, and read-ahead documents prepared for or used by Secretary Hegseth or any other **Senior OSD Personnel** concerning the Visit.
8. All talking points, draft statements, press releases, Q&A documents, and media-response materials concerning the Visit, including drafts and final versions, and including any such materials shared with the White House or the Department of the Army.
9. All authorizations, waivers of liability, indemnification agreements, ethics determinations (including any determination under 5 C.F.R. § 2635 or 32 C.F.R. Part 70), distinguished-visitor or “orientation” flight approvals, and any other records authorizing or approving Mr. Ritchie’s presence aboard an AH-64 Apache helicopter or aboard any other military aircraft on or about April 27, 2026.

10. All after-action reports, post-flight summaries, debriefings, internal reviews, inquiries, and referrals or non-referrals to the Department of Defense Office of the Inspector General concerning the Visit.
11. All photographs, videos, and audio recordings of the Visit in the possession, custody, or control of the Office of the Secretary of Defense or the Joint Staff, including imagery captured by the Defense Visual Information Distribution Service (DVIDS), OSD public affairs personnel, or military photographers or videographers accompanying the Secretary.

Search Scope

Please conduct a thorough search of all records systems reasonably likely to contain responsive records, including but not limited to government email accounts, government-issued mobile-device text-message stores, government-issued device backups, OSD calendaring systems, the Defense Travel System, and the records-management systems of the Office of the Secretary of Defense, the Office of the Deputy Secretary of Defense, the Office of the Chief of Staff, the Office of the Senior Military Assistant, the OSD Office of Public Affairs, and the Department of Defense Office of the General Counsel.

Because Senior OSD Personnel have, on prior occasions, conducted official agency business through personal email accounts, personal mobile devices, and end-to-end-encrypted messaging applications, please also search any personal accounts or personal devices used by **Senior OSD Personnel** to send or receive Communications concerning the Visit, and please request that those personnel forward to government records systems any responsive records that have not already been so forwarded.

If it is your position that responsive records exist but that those records (or portions of those records) are exempt from disclosure, please identify the records that are being withheld and state the basis for the denial for each record being withheld. In addition, please note that Public Citizen seeks each record *in its entirety*. Accordingly, please provide all nonexempt portions of the records, without redacting portions of any record as “non-responsive,” “out of scope,” or the like.

To the extent your office determines that responsive records are within the custody or control of another component of the Department of Defense or another federal agency, please refer this request, or the appropriate portion of it, to that component or agency, and please notify me of the referral. To the extent records are produced on a rolling basis, please produce records as they become available rather than waiting for completion of all searches.

I request that any records produced in response to this request be provided in electronic form wherever possible, in their native format with metadata intact, or, where that is not possible, as searchable text-recognized PDFs.

Public Citizen requests that all fees in connection with this FOIA request be waived in accordance with 5 U.S.C. § 552(a)(4)(A)(iii) because Public Citizen does not seek the records for

a commercial purpose and disclosure “is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government.” The requested records would shed light on the use of Department of Defense personnel, taxpayer-funded combat aircraft, and federal installation resources to provide a recreational flight to a private celebrity in the company of the Secretary of Defense; on whether the standard two-pilot crew complement for the AH-64 was deviated from in order to seat civilians in the gunner’s station; on whether civilians were permitted aboard armed Army aircraft and pursuant to what authorizations or waivers; and on whether public funds and federal property were used to confer a personal benefit on a political ally of President Trump. The Fort Belvoir public-affairs office has referred press inquiries to the Office of the Secretary of Defense, and the records sought are not otherwise publicly available. The use of military assets and personnel by the Secretary of Defense and questions of military aviation oversight are subjects of demonstrated and continuing interest to a broad audience of journalists, members of Congress, taxpayers, military-affairs researchers, and the general public, as evidenced by the sustained national press coverage of the visit and the related March 2026 incident involving Apache helicopters and Mr. Ritchie’s Nashville-area residence.¹

Public Citizen is a nonprofit research, litigation, and advocacy organization that represents the public interest before Congress, the executive branch, and the courts. Public Citizen has considerable expertise in the issues relevant to this records request — including federal ethics, conflicts of interest in the executive branch, the use of federal resources for private benefit, and government transparency. Public Citizen’s Trump Accountability project has produced extensive research and public commentary on conflicts of interest involving the Trump administration and on the use of federal resources to benefit Trump-aligned individuals and businesses.²

Public Citizen does not have a commercial interest in the requested records.

Public Citizen has a strong record of effectively conveying information to the public, including information obtained through Public Citizen’s use of FOIA, and Public Citizen intends to share the information received from this request with the public free of charge. Public Citizen

¹See, e.g., Ryan Grim, *Scoop: Kid Rock flew to Fort Belvoir this morning on his private jet and took a little joy ride on 2 Apache helicopters with War Secretary Pete Hegseth*, X (Apr. 27, 2026), [x.com/ryangrim/status/2048847394641412290](https://twitter.com/ryangrim/status/2048847394641412290); Hafiz Rashid, *WTF Was Kid Rock Doing on an Apache Helicopter With Pete Hegseth?*, New Republic (Apr. 27, 2026), newrepublic.com/post/209569/kid-rock-apache-helicopter-pete-hegseth; *Kid Rock scores ride in Apache helicopter with Trump defense chief: Army sources*, AlterNet (Apr. 27, 2026), alternet.org/kid-rock-helicopter/.

²See, e.g., Public Citizen, *Banquet of Greed: Trump Ballroom Donors Feast on Federal Funds and Favors* (Nov. 2025), citizen.org/article/banquet-of-greed-trump-ballroom-donors-feast-on-federal-funds-and-favors/ (analyzing federal contracts, dropped enforcement actions, and policy benefits flowing to corporate and individual donors to a Trump-directed White House project); Public Citizen, *Trump Administration Finally Discloses White House Ballroom Funding Contract in Response to Public Citizen’s FOIA Lawsuit* (Apr. 22, 2026), citizen.org/news/trump-administration-finally-discloses-white-house-ballroom-funding-contract-in-response-to-public-citizens-foia-lawsuit/; Public Citizen & Citizens for Responsibility and Ethics in Washington, *We Can Trump-Proof the Presidency: Executive Branch Ethics Laws That Require Immediate Fixes*, citizen.org/news/we-can-trump-proof-the-presidency-executive-branch-ethics-laws-that-require-immediate-fixes/.

distributes information through its website,³ Facebook,⁴ Bluesky,⁵ and email listservs. It also maintains multiple blogs,⁶ publishes a bi-monthly newspaper,⁷ and issues frequent press releases.⁸ Many of Public Citizen's reports, petitions, or other research products grab headlines in major newspapers, broadcast media, social media, and academic journals.⁹ Nearly every day, print and broadcast media around the world mention Public Citizen or quote its experts.¹⁰ Public Citizen also makes its experts available to speak to the media, to speak at conferences, and to testify before Congress.

Accordingly, I request that you waive all fees for locating and duplicating the requested records because Public Citizen is entitled to a public interest fee waiver. If, however, a waiver is not granted, please advise me of the amount of any proposed search, review, and reproduction charges before you conduct those activities.

Public Citizen further requests expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E) and the Department's implementing regulations. A compelling need exists on at least two independent grounds. First, Public Citizen is "primarily engaged in disseminating information," as established by the record of public dissemination described above, and there is an urgency to inform the public concerning actual federal-government activity. Second, this request concerns a matter of widespread and exceptional national media interest in which there exist possible questions about the government's integrity that affect public confidence: the Secretary of Defense's reported use of armed Army combat aircraft to provide a recreational flight to a private celebrity—under circumstances in which the standard two-pilot crew complement reportedly was waived to seat civilians in the gunner's station—has been the subject of sustained coverage by major national news outlets, has prompted public statements from

³See citizen.org.

⁴See facebook.com/publiccitizen (Public Citizen's Facebook page). Public Citizen's Facebook page has more than 145,000 followers.

⁵See bsky.app/profile/did:plc:mt3o2cf5fqpyqbyalwkegzef (Public Citizen's Bluesky page). Public Citizen's Bluesky page has more than 69,000 followers.

⁶See, e.g., Public Citizen: Consumer Law & Policy Blog, clpblog.citizen.org.

⁷See, e.g., Public Citizen News, November/December 2025, citizen.org/wp-content/uploads/Nov-PC-News-2025-final.pdf.

⁸See Public Citizen, Press Releases, citizen.org/news/type/press/.

⁹See, e.g., Mikella Schuettler, *White-Collar Enforcement Sinks Under Trump, Group Says*, Bloomberg (Jan. 15, 2026), bloomberg.com/news/articles/2026-01-15/white-collar-enforcement-sinks-under-trump-public-citizen-says; Jacob Gardenswartz, *Trump promised to 'drill, baby, drill.' But Americans' gas costs are up, new report finds*, Scripps News (Dec. 16, 2025), scrippsnews.com/politics/trump-promised-to-drill-baby-drill-but-americans-gas-costs-are-up-new-report-finds; Jonathan Edwards, *Report: Donors to Trump's White House ballroom have \$279B in federal contracts*, Wash. Post (Nov. 3, 2025), washingtonpost.com/politics/2025/11/03/trump-ballroom-donors-contracts-enforcement/; *More than 40 Trump administration picks tied directly to oil, gas and coal, analysis shows*, The Guardian (Oct. 9, 2025), theguardian.com/us-news/2025/oct/08/trump-administration-fossil-fuels-climate.

¹⁰See, e.g., In the News, Public Citizen, citizen.org/news/type/in-the-news/.

Members of Congress and at least one governor,¹¹ and follows by less than a month a separate Apache-helicopter incident involving the same private individual in which Secretary Hegseth publicly intervened to halt an ongoing Army investigation. The records sought will lose much of their value to public understanding if they are not produced promptly. Pursuant to 5 U.S.C. § 552(a)(6)(E)(vi), I certify that the foregoing statements, and the statements made elsewhere in this letter in support of expedited processing, are true and correct to the best of my knowledge and belief.

I expect a determination as to the request for expedited processing within 10 calendar days, as required by 5 U.S.C. § 552(a)(6)(E)(ii)(I). If expedited processing is granted, please process this request as soon as practicable. If expedited processing is denied, I expect a substantive response within 20 working days as otherwise required by law. If you have any questions regarding this request, please contact me by phone at (202) 804-2744 or by e-mail at zeverson@citizen.org.

Thank you very much for your attention to this matter.

Sincerely,

Zach Everson

On behalf of Public Citizen

¹¹ See, e.g., Jason Crow (@RepJasonCrow), X (Apr. 27, 2026), <https://x.com/RepJasonCrow/status/2048891961038278990> (post by Rep. Jason Crow, D-Colo., a member of the House Armed Services Committee and former Army Ranger, questioning Secretary Hegseth's use of taxpayer dollars to give Mr. Ritchie "joy rides" on Apache helicopters); Governor Newsom Press Office (@GovPressOffice), X (Apr. 27, 2026), <https://x.com/GovPressOffice/status/2048863356241821878> (post by the press office of California Governor Gavin Newsom questioning why taxpayers were paying to fly Mr. Ritchie aboard \$100 million helicopters)