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January 6, 2017

VIA EMAIL

Communications Center (FOIA/PA)  
245 Murray Lane  
Building T-5  
Washington, D.C. 20223  
Email: [FOIA@uss.s.dhs.gov](mailto:FOIA@uss.s.dhs.gov)

**RE: Freedom of Information Act Request**

Dear Sir or Madam:

On behalf of Public Citizen, and pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I request:

1. All records related to current and future coordination between the United States Secret Service and any person or entity providing private security to President-elect Donald Trump.
2. All records related to plans for the sharing of information between the United States Secret Service and any person or entity providing private security to President-elect Trump, including but not limited to the sharing of the Secret Service's Master Central Index or other confidential databases.
3. All confidentiality agreements entered into between the United States Secret Service and any person or entity providing private security to President-elect Trump.
4. All records related to the costs that have been incurred or are expected to be incurred by the government related to President-elect Trump's use of private security.
5. All records related to the costs that have been incurred or are expected to be incurred by the government related to continued use by President-elect Trump and his family of his home in New York, as well as his other residences in the United States.

I request these records for the time period November 9, 2016, up through and including the date of processing of this request.

The term “private security” should be construed to include, but not be limited to, any person or entity outside of the government employed or hired directly or indirectly by President-elect Trump to serve in any security-related capacity or to coordinate security or protection related issues.

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 provide the nonexempt portions of the records. Public Citizen seeks each record *in its entirety*. Accordingly, please do not redact portions of any record as “non-responsive,” “out of scope,” or the like.

I request that any records produced in response to this request be provided in electronic form whenever possible.

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 subject of the request concerns the operations or activities of the government because President-elect Trump’s use of private security raises significant concerns related to government expenditures and privacy stemming from the potential sharing of information between the Secret Service and his private security. The requested records will contribute to a meaningful understanding of the operations or activities of the government as related to the President-elect’s private security. None of this information is currently in the public domain.

Public Citizen, which has members and supporters nationwide, is a nonprofit research, litigation, and advocacy organization that represents the public interest before Congress, the executive branch, and the courts. It fights for openness and democratic accountability in government; for social and economic justice in globalization and trade policies; for clean, safe and sustainable energy; for strong health, safety and environmental protections; for safe, effective and affordable medicines and health care; and for the right of consumers to seek redress in the courts. Public Citizen does not have a commercial interest in the requested records; it intends to share information received from this request with the public free of charge.

Public Citizen has a demonstrated capacity to disseminate this information to the public. Public Citizen has staff dedicated to distributing its publications through its website, newsletters, Twitter, Facebook, listservs, and press releases. Many of Public Citizen’s reports, petitions, and other research products grab headlines in major newspapers, broadcast media, social media, and academic journals. Public Citizen maintains four blogs, publishes a bi-monthly newspaper, and issues frequent press releases. Nearly every day, print and broadcast media around the world mention Public Citizen or quote its experts. Public Citizen also makes its experts available to speak to the media, at conferences, and to testify before Congress. There is widespread interest in President-elect Trump’s use of private security. Disclosure of the requested information will significantly increase the public’s understanding of whether and to what extent the President-elect’s unorthodox decision to continue to have private security will affect the privacy or

pocketbooks of ordinary taxpayers. Accordingly, Public Citizen is entitled to a public interest fee waiver.

Please respond within 20 working days as provided by law. If you have any questions regarding this request, please contact me by phone at (202) 588-1000 or by e-mail at [ssherman@citizen.org](mailto:ssherman@citizen.org).

Thank you very much for your attention to this matter.

Sincerely,

Sean M. Sherman  
On behalf of Public Citizen, Inc.