



January 21, 2025

By Electronic Submission

U.S. General Services Administration  
FOIA Requester Service Center (LG)  
1800 F Street, NW, 7308  
Washington, DC 20405-0001

***RE: Freedom of Information Act Request***

Dear FOIA Officer:

The Campaign Legal Center (CLC) submits this request pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*, for the records specified below.

**I. Definition**

For purposes of this FOIA request, “Department of Government Efficiency” or “DOGE” refers to an entity called “Department of Government Efficiency” or “DOGE” affiliated or associated with President Trump, with his transition team, with Elon Musk, and/or with Vivek Ramaswamy prior to January 20, 2025—including any records relating to such an entity that were created, were received, or entered into the agency’s possession on or after January 20, 2025. If a nongovernmental organization called “Department of Government Efficiency” or “DOGE” or originating from the aforementioned entity exists after January 20, 2025, all references in this FOIA to “Department of Government Efficiency” or “DOGE” include that nongovernmental organization—regardless of its current name.

For purposes of this FOIA request, references to “Department of Government Efficiency” or “DOGE” do *not* encompass the U.S. Digital Service at any point prior to January 20, 2025, and do *not* encompass the U.S. D.O.G.E. Service. (Please note the separate language specifically requesting information related to the U.S. DOGE Service Temporary Organization.)

**II. Requested Records**

Please provide the following records created by, received by, or in the possession of your office from November 5, 2024 through the date of your search:

1. Any and all requests, communications, and/or correspondence sent or received by your office or agency regarding the deployment of individuals associated or affiliated with the “Department of Government Efficiency,” “DOGE,” or “DOGE Teams” to any office or agency within the federal government;
2. Any and all records pertaining to any past or planned meeting that included or includes any person or persons affiliated or associated with the “Department of Government Efficiency,” “DOGE,” or the U.S. DOGE Service Temporary Organization, including but not limited to requests, communications, correspondence, calendar invites, and/or minutes;
3. Any and all records pertaining to any past or planned meeting relating to the “Department of Government Efficiency,” “DOGE,” or the U.S. DOGE Service Temporary Organization, including but not limited to requests, communications, correspondence, calendar invites, and/or minutes;
4. Any guidance documents, legal memoranda, policy memoranda, policy directives, or similar records relating to the “Department of Government Efficiency,” “DOGE,” or the U.S. DOGE Service Temporary Organization;
5. Any and all records relating to the selection of DOGE Team members for your agency;<sup>3</sup>
6. Any and all records relating to the hiring of DOGE Team members to be placed within your agency, including but not limited to the hiring of special government employees;<sup>4</sup>
7. Any and all other records pertaining to the “Department of Government Efficiency,” “DOGE,” or the U.S. DOGE Service Temporary Organization;
8. Any and all communications between any employee or employees of your office or agency and any or all of the following individuals:
  - a. Elon Musk
  - b. Vivek Ramaswamy
  - c. Katie Miller
  - d. Brad Smith
  - e. Steve Davis
  - f. William McGinley
  - g. Matt Luby
  - h. Joanna Wischer
  - i. Rachel Riley
  - j. Chris Gober
  - k. Steve Roberts
  - l. Emil Michael
  - m. Baris Akis
  - n. James Burnham
  - o. James Fishback
  - p. Marc Andreessen

9. Any and all communications between employees of your office or agency and individuals affiliated or associated with the “Department of Government Efficiency,” “DOGE,” or the U.S. DOGE Service Temporary Organization, and
10. Any and all communications between employees of your office or agency and individuals with an email address ending in spacex.com or tesla.com.

This request encompasses both digital and physical records. Please note that this request applies to all emails sent and received on governmental email addresses, as well as to all emails sent and received on all other email addresses and accounts used to conduct official business. This request also encompasses all communications to or from any employee of your office or agency transmitted through any messaging platform, including but not limited to Signal, WhatsApp, iMessage, X (including direct messages), Truth Social, Microsoft Teams, and other similar platforms. It further encompasses calendar invites and telephone logs for all platforms and devices used to conduct official business.

If some portions of the requested records are exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. 5 U.S.C. § 552(b). If any portion of the requested records is exempt from disclosure, please provide an index of the withheld materials. *See Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1972).

### **III. Application for Fee Waiver or Limitation of Fees**

#### **A. The request is made for non-commercial purposes and will contribute significantly to public understanding of the operations or activities of government.**

FOIA provides that the agency shall furnish requested records without charge or at reduced charge 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)(iii); *see also* 15 C.F.R. §4.11 (2018).

The requested materials involve matters of significant public interest. These details are not already publicly available, and the records will provide a more thorough public understanding of the operations of the government—specifically, the operations of the “Department of Government Efficiency” or “DOGE” and how it advises, works with, or otherwise intersects with federal executive branch departments and agencies.

CLC will use records responsive to this request in the creation of widely disseminated materials and analysis that will educate the public about these matters and the operations of the government. CLC anticipates analyzing the materials gathered through this FOIA

request to develop reports,<sup>1</sup> write blogs,<sup>2</sup> and author op-eds.<sup>3</sup> CLC’s research and reports are widely disseminated on its blog,<sup>4</sup> through its own website,<sup>5</sup> through social media platforms like Facebook<sup>6</sup> and Twitter,<sup>7</sup> and regular emails to its supporters, among other communications outlets.

CLC staff have significant knowledge in ethics and government accountability, and news media regularly rely upon CLC’s analysis and expertise.<sup>8</sup> In addition to its own blogs and reports, CLC anticipates analyzing the requested records and disseminating the materials among traditional news outlets.

Requester CLC is a non-profit public interest organization organized under Section 501(c)(3) of the Internal Revenue Code, and this request is made for non-commercial purposes.

For these reasons, we request that any applicable fees associated with this request be waived pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). A fee waiver in this instance would fulfill Congress’ intent in amending the FOIA. *See Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) (“Congress amended FOIA to ensure that it be liberally construed in favor of waivers for noncommercial requesters.” (quotation marks omitted)).

#### **B. CLC qualifies for a fee waiver as a “representative of the news media.”**

CLC additionally requests that it not be charged search or review fees for this request because the organization meets the definition of a “representative of the news media” for purposes of the FOIA, since CLC “gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and

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<sup>1</sup> See, e.g., Roger G. Wieand & Delaney Marsco, *The Donor-To-Ambassador Pipeline: Why America’s Key Diplomats are Often Wealthy Donors*, Campaign Legal Center (May 30, 2023), [https://campaignlegal.org/sites/default/files/2023-05/DTA\\_Report\\_Final.pdf](https://campaignlegal.org/sites/default/files/2023-05/DTA_Report_Final.pdf).

<sup>2</sup> See, e.g., Danielle Caputo, *Lax Ethics Enforcement Allows Lawmakers to Hide Gifts of Free Travel*, Campaign Legal Center blog (July 18, 2023), <https://campaignlegal.org/update/lax-ethics-enforcement-allows-lawmakers-hide-gifts-free-travel>; Janel Forsythe, *Public Interest or Private Gain? Stock Trading Across the Federal Government*, Campaign Legal Center blog (May 3, 2023), <https://campaignlegal.org/update/public-interest-or-private-gain-stock-trading-across-federal-government>.

<sup>3</sup> See, e.g., Kedric Payne, *Supreme Court Has a Lot to Learn About Ethics From Other Branches*, BLOOMBERG LAW (May 10, 2023), <https://news.bloomberglaw.com/us-law-week/supreme-court-has-a-lot-to-learn-about-ethics-from-other-branches>.

<sup>4</sup> See Campaign Legal Center blog at <https://campaignlegal.org/latest>.

<sup>5</sup> See “Toolkits, Reports, and Resources,” Campaign Legal Center, <https://www.nytimes.com/2025/01/18/opinion/hamilton-musical-history.html>.

<sup>6</sup> See <https://www.facebook.com/CampaignLegalCenter/>.

<sup>7</sup> See <https://twitter.com/CampaignLegal>.

<sup>8</sup> See, e.g., *Washington Journal: Delaney Marsco on Congress and Stock Trading Rules*, C-SPAN (Jan 25, 2022), <https://www.c-span.org/video/?517386-4/delaney-marsco-congress-stock-trading-rules>; Luke Broadwater, *Ethics Investigators in Congress Increasingly Run Into Walls*, N.Y. TIMES (Dec. 28, 2021), <https://www.nytimes.com/2021/12/28/us/politics/congress-ethics-investigations.html>; Amy B. Wang, *House Republicans pass ethics changes that Democrats say would hamper probes*, WASH. POST (Jan. 9, 2023), <https://www.washingtonpost.com/politics/2023/01/09/house-ethics-rules/>.

distributes that work to an audience.” 5 U.S.C. § 552(a)(4)(A)(ii)(II)-(III); *see also* 15 C.F.R. §4.11(b)(6)(2018).

As the D.C. Circuit has held, the “representative of the news media” test is focused on the requestor rather than the specific FOIA request. *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1121 (D.C. Cir. 2015). CLC satisfies this test because (as noted in Part III(A)) CLC applies its expertise and editorial skills to turn raw materials into reports, articles, and op-eds that are widely disseminated on its blog,<sup>9</sup> through its own website,<sup>10</sup> through social media platforms and regular emails to its supporters, and through other communications outlets. CLC additionally applies editorial skill to analyze and disseminate materials to other news media outlets, which regularly cite and rely upon CLC’s work. The D.C. Circuit has held that a requester may qualify as a news media entity if it “distribute[s] [its] work’ by issuing press releases to media outlets in order to reach the public indirectly” *Cause of Action*, 799 F.3d. at 1125-26.

Courts have found that other organizations with functionally similar missions and that have engaged in similar public education activities qualify as “representatives of the news media,” even if engaged in litigation or other advocacy beyond educating the public about the operations of government. *See, e.g., Cause of Action*, 799 F.3d at 1121-25 (finding a public interest advocacy organization that comments to other media outlets about documents it obtains under FOIA a news media requester); *Judicial Watch, Inc. v. DOJ*, 133 F. Supp. 2d 52, 53-54 (D.D.C. 2000) (finding “public interest law firm” Judicial Watch a news media requester); *Elec. Privacy Info. Ctr. V. DOD*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding nonprofit public interest group that published a biweekly email newsletter a news media requester). As Congress made clear: “It is critical that the phrase ‘representative of the news media’ be interpreted broadly if the act is work as expected . . . . In fact, *any person or organization which regularly publishes or disseminates information to the public . . . should qualify for waivers as a ‘representative of the news media.’*” 132 Cong. Rec. S14298 (daily ed. Sept. 30, 1986), cited in *Nat’l Sec. Archive v. U.S. Dep’t of Def.*, 880 F.2d 1381, 1386 (D.C. Cir. 1989).

In the event the fee waiver is not granted, CLC may not be charged for the first two hours of search time, or for the first hundred pages of duplication. CLC does not at this time authorize processing costs exceeding \$100. Please contact CLC using the below contact information and advise CLC of the cost of this request if processing costs exceed \$100.

#### **IV. Application for Expedited Processing**

CLC requests that the processing of this request be expedited pursuant to 21 C.F.R. § 20.44 (a)(2), which allows for expedited processing when a requester demonstrates a compelling need or urgency for the information (i.e., when there is an urgency to inform the public about an actual or alleged federal government activity, such as where the information sought has particular value that will be lost if not disseminated quickly). As described in Part II, the subject of the request involves a matter of significant public interest. The information requested is “urgen[tly]” needed by CLC, an organization “primarily engaged in

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<sup>9</sup> *See* Campaign Legal Center blog at <https://campaignlegal.org/latest>.

<sup>10</sup> *See* “Media Center,” Campaign Legal Center, <https://campaignlegal.org/media-center>.

disseminating information,” “to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

CLC is an organization “primarily engaged in disseminating information” within the meaning of the statute. *Id.* As described in Section II.A, CLC obtains and analyzes government information and widely publishes and disseminates research and reports to the public and media. These activities are critical to CLC’s work and among CLC’s primary activities. CLC plans to analyze and disseminate to the public information gathered through this request, at no cost to the public.

The requested records are urgently needed to inform the public about actual or alleged government activity. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II); 28 C.F.R. § 16.5(e)(1)(ii). Specifically, they pertain to the creation of the “Department of Government Efficiency” or “DOGE,” a new governmental entity whose “structure . . . is still amorphous and closely held.”<sup>11</sup> DOGE has been the subject of significant media attention and public controversy, and little has been revealed about it publicly. Consequently, the records sought relate to a matter of widespread and exceptional interest, and there is an urgent need to inform the public about DOGE’s role and function within the federal government.

Pursuant to applicable statutes and regulations, CLC expects a determination regarding expedited processing within 10 days. *See* 5 U.S.C. § 552(a)(6)(E)(ii).

## **V. Delivery of Requested Records**

In order to expedite delivery of these requested documents and in order to reduce possible fees incurred, CLC requests that these documents be delivered either digitally via email (in PDF format), or on a data disk via the U.S. Postal Service. Please email copies of responsive documents to:

[khuddleston@campaignlegalcenter.org](mailto:khuddleston@campaignlegalcenter.org)  
[khamilton@campaignlegalcenter.org](mailto:khamilton@campaignlegalcenter.org)

In the alternative, if email production is not possible, please mail copies of responsive documents to:

**Kate Huddleston**  
**Campaign Legal Center**  
**1101 14<sup>th</sup> St. NW, Suite 400**  
**Washington, D.C. 20005**

Should you elect, for any reason, to withhold, redact, or deny the release of any record responsive to this request, CLC requests that you provide an explanation for each withholding/redaction, along with pertinent legal citations.

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<sup>11</sup> Theodore Schleifer & Madeleine Ngo, *Inside Elon Musk’s Plan for DOGE to Slash Government Costs*, N.Y. TIMES (Jan. 12, 2025), <https://www.nytimes.com/2025/01/12/us/politics/elon-musk-doge-government-trump.html>.

Please confirm receipt of this request and provide an estimate of processing time. Thank you for your prompt attention to this matter.

Sincerely,

/s/ Kate Huddleston

Kate Huddleston, Senior Legal Counsel

Kate Hamilton, Legal Counsel

Campaign Legal Center

1101 14th St. NW, Ste. 400

Washington, D.C. 20005

khuddleston@campaignlegalcenter.org

khamilton@campaignlegalcenter.org

(202) 736-2200



January 21, 2025

By Electronic Submission

U.S. DOGE Service  
Attn: FOIA Officer  
36 Jackson Pl NW  
Washington, DC 20503

***RE: Freedom of Information Act Request***

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2. Any and all records pertaining to any past or planned meeting that included or includes any person or persons affiliated or associated with the U.S. DOGE Service Temporary Organization, including but not limited to requests, communications, correspondence, calendar invites, and/or minutes;
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7. Any guidance documents, legal memoranda, policy memoranda, policy directives, or similar records relating to the “Department of Government Efficiency” or “DOGE”;
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### **III. Application for Fee Waiver or Limitation of Fees**

#### **A. The request is made for non-commercial purposes and will contribute significantly to public understanding of the operations or activities of government.**

FOIA provides that the agency shall furnish requested records without charge or at reduced charge 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)(iii); *see also* 15 C.F.R. §4.11 (2018).

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CLC will use records responsive to this request in the creation of widely disseminated materials and analysis that will educate the public about these matters and the operations of the government. CLC anticipates analyzing the materials gathered through this FOIA request to develop reports,<sup>1</sup> write blogs,<sup>2</sup> and author op-eds.<sup>3</sup> CLC's research and reports are widely disseminated on its blog,<sup>4</sup> through its own website,<sup>5</sup> through social media platforms like Facebook<sup>6</sup> and Twitter,<sup>7</sup> and regular emails to its supporters, among other communications outlets.

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As the D.C. Circuit has held, the “representative of the news media” test is focused on the requestor rather than the specific FOIA request. *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1121 (D.C. Cir. 2015). CLC satisfies this test because (as noted in Part III(A)) CLC applies its expertise and editorial skills to turn raw materials into reports, articles, and op-eds that are widely disseminated on its blog,<sup>9</sup> through its own website,<sup>10</sup> through social media platforms and regular emails to its supporters, and through other communications outlets. CLC additionally applies editorial skill to analyze and disseminate materials to other news media outlets, which regularly cite and rely upon CLC’s work. The D.C. Circuit has held that a requester may qualify as a news media entity if it “‘distribute[s] [its] work’ by issuing press releases to media outlets in order to reach the public indirectly” *Cause of Action*, 799 F.3d. at 1125-26.

Courts have found that other organizations with functionally similar missions and that have engaged in similar public education activities qualify as “representatives of the news media,” even if engaged in litigation or other advocacy beyond educating the public about the operations of government. *See, e.g., Cause of Action*, 799 F.3d at 1121-25 (finding a public interest advocacy organization that comments to other media outlets about documents it obtains under FOIA a news media requester); *Judicial Watch, Inc. v. DOJ*, 133 F. Supp. 2d 52, 53-54 (D.D.C. 2000) (finding “public interest law firm” Judicial Watch a news media requester); *Elec. Privacy Info. Ctr. V. DOD*, 241 F. Supp. 2d 5, 10-15 (D.D.C. 2003) (finding nonprofit public interest group that published a biweekly email newsletter a news media requester). As Congress made clear: “It is critical that the phrase ‘representative of the news media’ be interpreted broadly if the act is work as expected . . . . In fact, *any person or organization which regularly publishes or disseminates information to the public . . . should qualify for waivers as a ‘representative of the news media.’*” 132 Cong. Rec. S14298 (daily ed. Sept. 30, 1986), cited in *Nat’l Sec. Archive v. U.S. Dep’t of Def.*, 880 F.2d 1381, 1386 (D.C. Cir. 1989).

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sought has particular value that will be lost if not disseminated quickly). As described in Part II, the subject of the request involves a matter of significant public interest. The information requested is “urgen[tly]” needed by CLC, an organization “primarily engaged in disseminating information,” “to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

CLC is an organization “primarily engaged in disseminating information” within the meaning of the statute. *Id.* As described in Section II.A, CLC obtains and analyzes government information and widely publishes and disseminates research and reports to the public and media. These activities are critical to CLC’s work and among CLC’s primary activities. CLC plans to analyze and disseminate to the public information gathered through this request, at no cost to the public.

The requested records are urgently needed to inform the public about actual or alleged government activity. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II); 28 C.F.R. § 16.5(e)(1)(ii). Specifically, they pertain to the creation of the “Department of Government Efficiency” or “DOGE,” a new governmental entity whose “structure . . . is still amorphous and closely held.”<sup>11</sup> DOGE has been the subject of significant media attention and public controversy, and little has been revealed about it publicly. Consequently, the records sought relate to a matter of widespread and exceptional interest, and there is an urgent need to inform the public about DOGE’s role and function within the federal government.

Pursuant to applicable statutes and regulations, CLC expects a determination regarding expedited processing within 10 days. *See* 5 U.S.C. § 552(a)(6)(E)(ii).

## V. Delivery of Requested Records

In order to expedite delivery of these requested documents and in order to reduce possible fees incurred, CLC requests that these documents be delivered either digitally via email (in PDF format), or on a data disk via the U.S. Postal Service. Please email copies of responsive documents to:

[khuddleston@campaignlegalcenter.org](mailto:khuddleston@campaignlegalcenter.org)  
[khamilton@campaignlegalcenter.org](mailto:khamilton@campaignlegalcenter.org)

In the alternative, if email production is not possible, please mail copies of responsive documents to:

**Kate Huddleston**  
**Campaign Legal Center**  
**1101 14<sup>th</sup> St. NW, Suite 400**  
**Washington, D.C. 20005**

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<sup>11</sup> Theodore Schleifer & Madeleine Ngo, *Inside Elon Musk’s Plan for DOGE to Slash Government Costs*, N.Y. TIMES (Jan. 12, 2025), <https://www.nytimes.com/2025/01/12/us/politics/elon-musk-doge-government-trump.html>.

Should you elect, for any reason, to withhold, redact, or deny the release of any record responsive to this request, CLC requests that you provide an explanation for each withholding/redaction, along with pertinent legal citations.

Please confirm receipt of this request and provide an estimate of processing time. Thank you for your prompt attention to this matter.

Sincerely,

*/s/ Kate Huddleston*

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