



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

OFFICE OF GENERAL COUNSEL

January 16, 2020

Austin R. Evers
American Oversight
1030 15th Street, NW, Suite B255
Washington, DC 20005
foia@americanoversight.org

Dear Mr. Evers,

This letter is in response to your Freedom of Information Act ("FOIA") request No. SBA-2020-000237 in which you have requested the following:

1. Any final guidance, policies, directives, and/or memoranda issued since January 20, 2017, regarding SBA loan applications from non-U.S. citizens and/or businesses that are not at least 51 percent owned by U.S. citizens.
2. All email communications (including emails, email attachments, and calendar invitations), regardless of subject matter, between or among any SBA official listed in Column A and any entity listed in Column B, below:

Column A: SBA Officials	Column B: External Entities
i. Former Administrator Linda McMahon	i. Federation for American Immigration Reform (including any emails sent to or received from an address ending in @fairus.org)
ii. Acting Administrator Chris Pilkerton, including in his capacity of General Counsel	ii. Immigration Reform Law Institute (including any emails sent to or received from an address ending in @irli.org)
iii. Anyone serving as Chief of Staff, including Former Chief of Staff Pradeep Belur	iii. Center for Immigration Studies (including any emails sent to or received from an address ending in @cis.org)
iv. Any person serving in the capacity of White House Liaison or White House Advisor	iv. NumbersUSA (including any emails sent to or received from an address ending in @numbersusa.com or @numbersusa.org)
v. Associate Administrator, Office of Entrepreneurial Development, Allen Gutierrez	
vi. Special Advisor Ryan Anthony Lambert	

vii. Senior Advisor Lucia Maria Castellano	v. The Remembrance Project (including any emails sent to or received from an address ending in @theremembranceproject.org)
viii. Senior Advisor William Briggs	vi. VDARE Foundation (including anyone with an email address ending in @vdare.com)
ix. Senior Advisor Patricia Gibson, including in her former capacity as Associate Director, Office of Communications and Public Liaison	vii. Heritage Foundation (including any emails sent to or received from an address ending in @heritage.org)
x. Associate Director, Office of Communications and Public Liaison, Jim Billimoria	
xi. Associate Director, Office of Communications and Public Liaison, Erin McCracken	
xii.	

Please provide all responsive records from January 20, 2017, through the date the search is conducted.

3. All email communications (including emails, email attachments, and calendar invitations), regardless of subject matter, between or among any SBA official listed in Column A and any entity listed in Column B, below:

Column A: SBA Officials	Column B: White House Officials
i. Former Administrator Linda McMahon	i. Stephen Miller (including but not limited to the email address stephen.miller@who.eop.gov)
ii. Acting Administrator Chris Pilkerton, including in his capacity of General Counsel	ii. Robert Gabriel (including but not limited to the email address robert.gabriel@who.eop.gov)
iii. Anyone serving as Chief of Staff, including Former Chief of Staff Pradeep Belur	iii. Jennifer Cytryn (including but not limited to the email address jennifer.cytryn@who.eop.gov)
iv. Any person serving in the capacity of White House Liaison or White House Advisor	iv. McLaurine Klingler (including but not limited to the email address mclaurine.klingler@who.eop.gov)
v. Associate Administrator, Office of Entrepreneurial Development, Allen Gutierrez	
vi. Special Advisor Ryan Anthony Lambert	
vii. Senior Advisor Lucia Maria Castellano	
viii. Senior Advisor William Briggs	
ix. Senior Advisor Patricia Gibson, including in her former capacity	

	as Associate Director, Office of Communications and Public Liaison	
x.	Associate Director, Office of Communications and Public Liaison, Jim Billimoria	
xi.	Associate Director, Office of Communications and Public Liaison, Erin McCracken	

Please provide all responsive records from January 20, 2017, through the date the search is conducted.

SBA is releasing the attached documents that are responsive to your request. Redactions have been made pursuant to FOIA Exemption 6. FOIA Exemption 6 protects information about individuals in “personnel and medical files and similar files” when the disclosure of such information “would constitute a clearly unwarranted invasion of personal privacy.” The redacted information consists of a personal cell phone number, and clearly falls under the protection of FOIA exemption 6.

If you are dissatisfied with the Agency’s decision, you may file an administrative appeal within 90 days of the date of this letter to:

Office of Hearings and Appeals
Attention: Delorice Ford, FOIA Officer
409 3rd Avenue, SW – 8th Floor
Washington, DC 20416

If you are unable to resolve your FOIA dispute through our FOIA Public Liaison in the Office of Hearings and Appeals, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman's office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road--OGIS
College Park, MD 20740-6001
ogis@nara.gov
ogis.archives.gov
202-741-5770
877-684-6448

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric S. Benderson", is written over the word "Sincerely,".

Eric S. Benderson
Associate General Counsel for Litigation
Office of General Counsel
U.S. Small Business Administration

From: [Patel, Intel A. EOP/OMB](#)
To: jim.billimoria@sba.gov
Cc: [Binion, Thomas](#)
Subject: Heritage Foundation event on reorg
Date: Thursday, July 19, 2018 9:20:33 AM
Attachments: [draft invite agenda.docx](#)

JB -

Any interest from your team to have Administrator McMahon for this event for the 1030-11am on next Wednesday? I've cc'd Thomas Binion from Heritage to answer any Qs your team may have on this.

Neal

Neal A. Patel
Chief of Staff to the Deputy Director for Management
Office of Management and Budget | Executive Office of the President
O [REDACTED]
Neal.A.Patel@omb.eop.gov

Re-Organizing the Federal Government

Examining the White House's Overhaul Proposal

Featuring **The Honorable Margaret Weichert**

Deputy Director for Management, White House Office of Management and Budget

Hosted by

Kay Coles James

President

The Heritage Foundation

"Billions and billions of dollars are being wasted on activities that are not delivering results for hardworking American taxpayers. " President Donald J. Trump

In June, the White House released a proposed overhaul of the federal government that is unprecedented in size and scope. The plan will eliminate wasteful bureaucratic excess and streamline important federal activities into more efficient modes of operation. As this plan is implemented, Americans will reap the rewards of a leaner government.

This event will examine the various proposals included in the plan, their benefits, and the pathways to legislative enactment.

From 10- 10:30 AM- Deputy Director Weichert will introduce the audience to the detailed proposals

From 10:30 – 11 AM tk Invited speaker and the Heritage Foundation's Paul Winfree will imagine the benefits for all Americans when the plan is fully enacted.

From 11-11:30 tk invited speaker and the Heritage Foundation's Rachel Greszler will discuss both legislative and regulatory pathways to implementation for the various proposals

Wednesday, July 25, 2018 at 10:00 a.m.

The Heritage Foundation's Allison Auditorium

RSVP online at heritage.org/Events/ | or call (202) 675-1752

Terms and conditions of attendance are posted at heritage.org/Events/terms.cfm

All events may be viewed live at heritage.org

News media inquiries, call (202) 675-1761

214 Massachusetts Avenue, NE | Washington, DC 20002 | (202) 546-4400

From: [Howell, Mike](#)
To: christopher.pilkerton@sba.gov
Subject: Invitation to Heritage Honors Gala
Date: Thursday, September 26, 2019 12:47:04 PM
Attachments: [Heritage Honors Gala Invitation.pdf](#)

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Good Afternoon Acting Administrator Pilkerton,

The Heritage Foundation cordially invites you and a guest to our first annual Heritage Foundation Honors Gala on Tuesday, October 22, 2019 from 6:00-8:30 p.m. This black tie affair will be headlined by Vice President Mike Pence at the Marriott Marquis. We are hoping to have many other cabinet secretaries, ambassadors, and agency heads as well. We will celebrate the unique American values that unite us as a country and pay tribute to Heritage's extraordinary founder, Edwin J. Feulner.

You can register online at www.heritagehonors.org with the invite code GALASG. This invitation is non-transferrable.

Hope to see you there,
Mike

Mike Howell
Senior Advisor, Executive Branch Relations
The Heritage Foundation
214 Massachusetts Avenue, NE
Washington, DC 20002
202-608-1545
heritage.org

THE HERITAGE FOUNDATION *Honors*

HERITAGE PRESIDENT KAY C. JAMES
CORDIALLY INVITES YOU TO
OUR INAUGURAL GALA

*Join us as we celebrate the unique American values
that unite us as a country and pay tribute to
Heritage's extraordinary founder, Edwin J. Feulner.*



TUESDAY, OCTOBER 22, 2019

6:00 – 8:30 p.m.
(doors open at 5:30 p.m.)

MARRIOTT MARQUIS
Washington, DC

Black tie

Register online at
HERITAGEHONORS.ORG
with invite code GALASG.

*Registration for you and your guest is complimentary.
Invitation is non-transferable.*

SBA-19-1555-A-000004

From: [Howell, Mike](#)
To: christopher.pilkerton@sba.gov
Subject: RE: Invitation to Heritage Honors Gala
Date: Tuesday, October 8, 2019 4:44:00 PM

CAUTION - The sender of this message is external to the SBA network. Please use care when clicking on links and responding with sensitive information. Send suspicious email to spam@sba.gov.

Administrator Pilkerton,

Just wanted to follow up on this. We are close to hitting our limit and have had several cabinet and agency heads RSVP as well as senior White House officials, ambassadors, and leaders of the conservative movement. We'd love for you to join. If you are interested, please go ahead and RSVP using the invite code GALASG for you and a guest.

Mike Howell
Senior Advisor, Executive Branch Relations
The Heritage Foundation
214 Massachusetts Avenue, NE
Washington, DC 20002
202-608-1545
heritage.org

From: Howell, Mike
Sent: Thursday, September 26, 2019 12:46 PM
To: 'christopher.pilkerton@sba.gov' <christopher.pilkerton@sba.gov>
Subject: Invitation to Heritage Honors Gala

Good Afternoon Acting Administrator Pilkerton,

The Heritage Foundation cordially invites you and a guest to our first annual Heritage Foundation Honors Gala on Tuesday, October 22, 2019 from 6:00-8:30 p.m. This black tie affair will be headlined by Vice President Mike Pence at the Marriott Marquis. We are hoping to have many other cabinet secretaries, ambassadors, and agency heads as well. We will celebrate the unique American values that unite us as a country and pay tribute to Heritage's extraordinary founder, Edwin J. Feulner.

You can register online at www.heritagehonors.org with the invite code GALASG. This invitation is non-transferrable.

Hope to see you there,
Mike

From: [Schroeder, Allie F.](#)
To: [Gabriel, Robert EOP/WHO](#); [Uli, Gabriella M. EOP/WHO](#)
Cc: [Bradfield, Mary A.](#); [Turner, Holly](#)
Subject: RE: McMahon coming to EO????
Date: Thursday, October 12, 2017 11:15:00 AM

Confused what went wrong here - she was one of the first ones there.
Alexandra brought her in when it was time

Allie Schroeder
Office of the Administrator
U.S. Small Business Administration
allie.schroeder@sba.gov

-----Original Message-----

From: Gabriel, Robert EOP/WHO [<mailto:Robert.Gabriel@who.eop.gov>]
Sent: Thursday, October 12, 2017 11:14 AM
To: Uli, Gabriella M. EOP/WHO
Cc: Schroeder, Allie F.; Bradfield, Mary A.; Turner, Holly
Subject: Re: McMahon coming to EO????

THANKS

> On Oct 12, 2017, at 11:13 AM, Uli, Gabriella M. EOP/WHO <Gabriella.M.Uli@who.eop.gov> wrote:

>

> Robert, the Administrator should be in the Roosevelt room right now.

>

> Sent from my iPhone

>

>> On Oct 12, 2017, at 11:10 AM, Schroeder, Allie F. <Allie.Schroeder@sba.gov> wrote:

>>

>> Yes

>>

>> Allie Schroeder

>> Office of the Administrator

>> U.S. Small Business Administration

>> allie.schroeder@sba.gov

>>

>>

>> -----Original Message-----

>> From: Uli, Gabriella M. EOP/WHO [<mailto:Gabriella.M.Uli@who.eop.gov>]

>> Sent: Thursday, October 12, 2017 11:09 AM

>> To: Bradfield, Mary A.; Schroeder, Allie F.; Turner, Holly; Gabriel, Robert EOP/WHO

>> Subject: McMahon coming to EO????

>>

>> Is McMahon coming to EO signing at 11:15? Status? Need to know asap!!

>>

>> Sent from my iPhone

From: [Gabriel, Robert EOP/WHO](#)
To: [Uli, Gabriella M. EOP/WHO](#)
Cc: [Schroeder, Allie F.](#); [Bradfield, Mary A.](#); [Turner, Holly](#)
Subject: Re: McMahon coming to EO????
Date: Thursday, October 12, 2017 11:14:05 AM

THANKS

> On Oct 12, 2017, at 11:13 AM, Uli, Gabriella M. EOP/WHO <Gabriella.M.Uli@who.eop.gov> wrote:

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>>

>> Yes

>>

>> Allie Schroeder

>> Office of the Administrator

>> U.S. Small Business Administration

>> allie.schroeder@sba.gov

>>

>>

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>> Sent from my iPhone

From: [Schroeder, Allie F.](#)
To: [Uli, Gabriella M. EOP/WHO](#); [Bradfield, Mary A.](#); [Turner, Holly](#); [Gabriel, Robert EOP/WHO](#)
Subject: RE: McMahon coming to EO????
Date: Thursday, October 12, 2017 11:10:50 AM

Yes

Allie Schroeder
Office of the Administrator
U.S. Small Business Administration
allie.schroeder@sba.gov

-----Original Message-----

From: Uli, Gabriella M. EOP/WHO [<mailto:Gabriella.M.Uli@who.eop.gov>]
Sent: Thursday, October 12, 2017 11:09 AM
To: Bradfield, Mary A.; Schroeder, Allie F.; Turner, Holly; Gabriel, Robert EOP/WHO
Subject: McMahon coming to EO????

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Sent from my iPhone

From: [Gabriel, Robert EOP/WHO](#)
To: [Schroeder, Allie F.](#); [Uli, Gabriella M. EOP/WHO](#)
Cc: [Bradfield, Mary A.](#); [Turner, Holly](#)
Subject: RE: McMahon coming to EO????
Date: Thursday, October 12, 2017 11:16:36 AM

Just confirming, as she'll be acknowledged in POTUS' remarks

-----Original Message-----

From: Schroeder, Allie F. [<mailto:Allie.Schroeder@sba.gov>]
Sent: Thursday, October 12, 2017 11:15 AM
To: Gabriel, Robert EOP/WHO <Robert.Gabriel@who.eop.gov>; Uli, Gabriella M. EOP/WHO <Gabriella.M.Uli@who.eop.gov>
Cc: Bradfield, Mary A. <Mary.Bradfield@sba.gov>; Turner, Holly <Holly.Turner@sba.gov>
Subject: RE: McMahon coming to EO????

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>> Allie Schroeder
>> Office of the Administrator
>> U.S. Small Business Administration
>> allie.schroeder@sba.gov
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