AMERICAN OVERSIGHT

January 20, 2026

VIA EMAIL

National Archives and Records Administration
Archival Operations Division - Donald J. Trump Presidential Library
8601 Adelphi Rd.
College Park, MD 20740
trump.library@nara.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, American Oversight makes the following request for records.

During President Trump's first term in office, White House officials faced significant allegations of corruption and other conflicts of interest.[1] American Oversight seeks records with the potential to shed light on this matter.

Requested Records

American Oversight requests that your agency produce the following records within twenty business days:

> All text messages (including complete text message threads or conversations) and messages on messaging platforms (such as Signal, Slack, GChat or Google Hangouts, Lync, Skype, X (formerly Twitter) direct messages, Facebook messages, Microsoft Teams messages, WhatsApp, Telegram, Parler, Mattermost, Wickr, TeleMessage, TM SGNL or any app that can interface with an app such as those listed or otherwise borrow its technology) between President Donald Trump and any of the external individuals listed below.
>
> External Individuals:
> a. Albert Bourla
> b. Alex Jones
> c. Andrew Tate
> d. Amy Coney Barrett
> e. Anthony Kennedy
> f. Ben Shapiro

[1] *See, e.g.*, Jim Lardner, *Mapping Corruption: Donald Trump's Executive Branch*, Am. Prospect, Apr. 9, 2020, https://prospect.org/2020/04/09/mapping-corruption-donald-trump-executive-branch/.

g. Bill Ackman
h. Brett Kavanaugh
i. Brian Kilmeade
j. Candace Owens
k. Carol Tobias
l. Carolyn Meadows
m. Catherine Glenn Foster
n. Christopher Rufo
o. Clarence Thomas
p. Cliff Kincaid
q. Damon Hininger
r. Dan Bongino
s. David Duke
t. David Ricks
u. Dinesh D'Souza
v. Doug Logan
w. Edward Blum
x. Elmer Stewart Rhodes III
y. Elon Musk
z. Enrique Tarrio
aa. Franklin Graham
bb. George Zoley
cc. Glenn Beck
dd. Gregg Jarrett
ee. Howard Lutnick
ff. James "Jamie" Dimon
gg. Jeanine Pirro
hh. Jeffrey "Jeff" Bezos
ii. Jeffrey Epstein
jj. Joe Rogan
kk. John Eastman
ll. John Roberts
mm. Jor-El Godsey
nn. Kari Lake
oo. Kay Cole James
pp. Kristan Hawkins
qq. Larry Fink
rr. Laura Ingraham
ss. Laura Loomer
tt. Leonard Leo
uu. Lou Dobbs
vv. Marc Andreessen
ww. Maria Bartiromo
xx. Marjorie Dannenfelser
yy. Mark Krikorian
zz. Mark Zuckerberg
aaa. Matt Walsh
bbb. Megyn Kelly

ccc. Michelle Malkin
ddd. Michael Farris
eee. Melody Clarke
fff. Mike Lindell
ggg. Neil Gorsuch
hhh. Nick Fuentes
iii. Oliver North
jjj. Peter Brimelow
kkk. Peter "Pete" Brownell
lll. Peter "Pete" Hegseth
mmm. Richard Sackler
nnn. Richard Uihlein
ooo. Robby Starbuck
ppp. Rupert Murdoch
qqq. Ryan Williams
rrr. Samuel Alito
sss. Scott Bessent
ttt. Scott Presler
uuu. Scott Walter
vvv. Sean Feucht
www. Sean Hannity
xxx. Stephen Schwarzman
yyy. Terry Schlossberg
zzz. Thomas Rousseau
aaaa. Tom Fitton
bbbb. Tristan Tate
cccc. Tucker Carlson
dddd. Virginia "Ginni" Thomas

American Oversight requests that all images, videos, audio recordings, or other attachments regarding official government business shared via text message and/or messaging platforms be produced in response to this request. To the extent any hyperlinks and/or URLs were shared via text message and/or messaging platforms, American Oversight requests records in a form that displays the full URL.

American Oversight is not in a position to provide a phone number for the listed external individuals. If the listed officials are unable to provide them, please use the listed external individuals' names as search terms. For example, a search for text messages between President Trump and Alex Jones would be conducted by searching President Trump's text messages using the key terms "Alex" and "Jones" to identify potentially responsive records.

Please provide all responsive records from January 20, 2017, through January 20, 2021.

Fee Waiver Standard

American Oversight recognizes that NARA does not grant fee waivers for archival records. *See* 5 U.S.C. § 552(a)(4)(A)(iv) (fee waiver provisions not superseded by other, specific statutes setting fee levels of specific categories of records); 44 U.S.C. § 2116(c) (providing for fees for archival records). However, to the extent your agency is willing to exercise its discretion to grant a waiver of fees, American Oversight meets the relevant standards under 5 U.S.C. § 552(a)(4)(A)(iii). The subject of this request concerns the operations of the federal government, and the disclosures will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. Moreover, the request is for non-commercial purposes.

American Oversight requests a waiver of fees because disclosure of the requested information is "in the public interest because it is likely to contribute significantly to public understanding of operations or activities of the government."[2] The public has a significant interest in the allegations of corruption and conflicts of interest from President Trump's first term.[3] Records with the potential to shed light on this matter would contribute significantly to public understanding of operations of the federal government, including whether and to what extent non-government entities and individuals influenced White House decisions during the first Trump Administration. American Oversight is committed to transparency and makes the responses agencies provide to its FOIA requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

This request "is not primarily in the commercial interest of the requester."[4] In fact, as a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose, and the release of the information requested is not in American Oversight's commercial interest. American Oversight's mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).[5]

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted

[2] 5 U.S.C. § 552(a)(4)(A)(iii).
[3] *See supra* note 1.
[4] 5 U.S.C. § 552(a)(4)(A)(iii).
[5] American Oversight currently has approximately 16,000 followers on Facebook and 94,200 followers on X (formerly Twitter). American Oversight, Facebook, https://www.facebook.com/weareoversight/ (last visited Jan. 16, 2026); American Oversight (@weareoversight), X (formerly Twitter), https://x.com/weareoversight (last visited Jan. 16, 2026).

to its website.[6] Examples reflecting this commitment include the posting of records related to the first Trump Administration's contacts with Ukraine and analyses of those contacts;[7] posting records and editorial content about the federal government's response to the COVID-19 pandemic;[8] posting records received as part of American Oversight's "Audit the Wall" project to gather and analyze information related to the first Trump Administration's proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;[9] the posting of records related to an ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department's process for issuing such waivers;[10] and posting records and analysis of federal officials' use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.[11]

Accordingly, American Oversight qualifies for a fee waiver.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

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[6] *See generally Our Latest*, American Oversight, https://www.americanoversight.org/blog.
[7] *The Trump Administration's Contacts with Ukraine*, American Oversight, https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine.
[8] *See generally The Trump Administration's Response to Coronavirus*, American Oversight, https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus; *see, e.g.*, *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings.
[9] *See generally Audit the Wall*, American Oversight, https://www.americanoversight.org/investigation/audit-the-wall; *see, e.g.*, *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/.
[10] *DOJ Records Relating to Solicitor General Noel Francisco's Recusal*, American Oversight, https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents.
[11] *See generally Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense; *see, e.g.*, *New Information on Pompeo's 2017 Trips to His Home State*, American Oversight, https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state.

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- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or X (formerly Twitter) direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.

- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind.

- Our request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.

- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to FOIA.[12]

- In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.

Conclusion

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will

[12] *See Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); *cf. Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Jessica Jensen at foia@americanoversight.org or (276) 293-9853 ext. 1033. Also, if American Oversight's request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Jessica Jensen
Jessica Jensen
on behalf of
American Oversight