

February 28, 2018

**VIA EMAIL**

Homeland Security and Emergency Management Agency  
2720 Martin Luther King Jr. Ave, SW  
Washington, D.C. 20032

Re: Freedom of Information Act Request for Records Related to Possible Military Parade in Washington, D.C.

Dear Information Officer:

I am writing to request information pursuant to D.C. Law § 2-531, the Freedom of Information Act. According to a February 6, 2018 report in the Washington Post, on or about January 18, 2018 President Trump directed the Department of Defense to plan a military parade in Washington, D.C.<sup>1</sup> The article reports that Mr. Trump had previously expressed a desire for such a parade in more abstract terms, but that it has now moved to a more concrete preparation stage. According to the article, planning now includes consideration of potential parade routes (with the president's preferred option reportedly passing directly past the Trump International Hotel), particular hardware (including but not limited to Abrams tanks), costs, and dates. According to the article, Defense Department spokesman Thomas Crosson confirmed the report.<sup>2</sup>

**I. Requested materials**

To facilitate processing, we have narrowly tailored this request. We request any communications or documents, whether in the possession of the government, on government servers or devices or in the possession of individuals or on private or personal servers or devices, from the Homeland Security and Emergency Management Agency. We request any communications or documents from January 18, 2018 to the present, including:

1. Any communications, notes, or documents received by any employee, agent, or representative of the Homeland Security and Emergency Management Agency from any uniformed or civilian personnel of any Department of Defense component, including but not limited to Secretary Mattis or Joint

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<sup>1</sup> Greg Jaffe & Philip Rucker, Trump's 'marching orders' to the Pentagon: Plan a grand military parade, Wash. Post, Feb. 6, 2018, <http://wapo.st/2Beb9aQ>.

<sup>2</sup> See *id.*

- Chiefs of Staff Chairman Gen. Joseph F. Dunford Jr., pertaining to or addressing the idea of a potential military parade in Washington, D.C.
2. Any communications, notes, or documents received by any employee, agent, or representative of the Homeland Security and Emergency Management Agency from the White House pertaining to or addressing the idea of a potential military parade in Washington, D.C.
  3. Any communications, notes, or documents created, sent, received, or possessed by any employee, agent, or representative of the Homeland Security and Emergency Management Agency containing discussions of dates, costs, including estimated budgets, parade routes, vehicles, hardware, weapons, aircraft, units, equipment, materiel, and/or personnel for a potential military parade in Washington, D.C.
  4. Any communications, notes, or documents created, sent, received or possessed by any employee, agent, or representative of the Homeland Security and Emergency Management Agency regarding concerns about the potential military parade and/or any applications submitted related to a military parade.
  5. Any communications, notes, or documents created, sent, received, or possessed by any employee, agent, or representative of the Homeland Security and Emergency Management Agency containing any press inquiries or responses to press inquiries regarding the potential military parade in Washington, D.C.
  6. Any calendar entries, agendas, attendance lists, or other records of employees, agents, or representatives of the Homeland Security and Emergency Management Agency that pertain to conversations or communications regarding a potential military parade in Washington, D.C.

We ask that, in addition to reviewing all the materials that the Homeland Security and Emergency Management Agency would normally search in response to a FOIA request that the Homeland Security and Emergency Management Agency conduct a thorough search of government, private, and personal devices to ensure that any text messages or any other types of communication that may be retrieved from a computer, laptop, phone, or other electronic device used by the District or its staff in conducting government or government-related communications is reviewed and included in the response to our request.

## **II. Request for Fee Waiver**

Free Speech For People is a non-partisan, non-profit organization and seeks a fee waiver or reduction under Section 2-532(b). Free Speech For People is a national non-partisan, non-profit 501(c)(3) organization that works to restore republican democracy to the people. Free Speech For People's thousands of supporters around the country engage in education and non-partisan advocacy to encourage and support effective government of, by, and for the American people. One of our core

areas of work is gathering and broadly disseminating information to the public via our website and social media platforms such as Twitter and Facebook.

We also routinely gather and review documents and provide legal analysis to the public as well as members of the press. In addition, our staff have contributed to major national and important regional publications such as the Washington Post, TIME, Newsweek, U.S. News and World Report, and the Boston Globe. Free Speech For People intends to inform public understanding on the operations and activities of the federal government with respect to any discussions about a potential military parade in Washington, D.C. by giving access to the public to any documents transmitted to us via our FOIA request on Free Speech For People's website.

Free Speech For People will broadly disseminate this information to its broad audience and the public, including members of the press, with a legal analysis and assessment of the communications and documents and their implications, in order to significantly contribute to public understanding of the emerging controversy concerning the proposed military parade, the costs to taxpayers, and any concerns regarding the president's request, process, or decision.

In the event that the fee waiver or reduction is denied, I hereby authorize expenditure of up to \$100 in search, processing, and other production costs, with a request that production be made electronically. If costs exceed \$100, please contact me for further authorization.

Please do not hesitate to contact me with any questions regarding this request.

Sincerely,



Shanna Cleveland

Senior Counsel, Free Speech For People

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