

January 7, 2025

VIA ONLINE SUBMISSION

Department of State
Office of Information Programs and Services
2201 C Street N.W., Suite B266
Washington, D.C. 20520-0000

Dear Freedom of Information Officer:

Judicial Watch, Inc. (“Judicial Watch”) hereby requests that the Department of State provide the following records pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”):

1. All records regarding the proposed purchase or acquisition of the Greenland territory by the United States. This request includes, but is not limited to, all related cables/teletypes and emails sent or received by any official or employee assigned to the U.S. Embassy Copenhagen or the U.S. Consulate Nuuk.
2. All records regarding the visit of Donald Trump, Jr. to Greenland in January 2025.
3. All email messages sent or received by Consul Monica Bland containing the term “Trump,” with the exclusion of any records consisting entirely of media reports or press summaries.

The time frame for this request is October 1, 2024 to the present.

To the extent applicable, the following definitions apply to the request:

“COMMUNICATION(S)” means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more persons, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, voice-mail messages, text messages, electronic messaging (including instant messaging and chats delivered through Microsoft Teams, Google Workspace, Zoom Team Chat, or other similar systems), meeting minutes, discussions, releases, statements, reports, publications, and any recordings or reproductions thereof.

“DOCUMENT(S)” or “RECORD(S)” mean any kind of written, graphic, or recorded matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including drafts, originals, non-identical copies, and information stored magnetically, electronically, photographically or otherwise. As used herein, the terms “DOCUMENT(S)” or “RECORD(S)” include, but are not limited to, studies, papers, books, accounts, letters, diagrams, pictures, drawings, photographs, correspondence, telegrams, cables, text messages, emails, memoranda, notes, notations, work papers, intra-office and inter-office communications, communications to, between and among employees, contracts, financial agreements, grants, proposals, transcripts, minutes, orders, reports, recordings, or other documentation of telephone

or other conversations, interviews, affidavits, slides, statement summaries, opinions, indices, analyses, publications, questionnaires, answers to questionnaires, statistical records, ledgers, journals, lists, logs, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, tapes, discs, microfilm, and all other records kept, regardless of the title, author, or origin.

“PERSON” means individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

“REFERS,” “REFERRING TO,” “REGARDS,” REGARDING,” “RELATES,” “RELATING TO,” “CONCERNS,” “CONCERNING” or “PERTAINS TO” mean, containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing, or characterizing, either directly or indirectly, in whole or in part.

Please determine whether to comply with this request within the time period required by FOIA and notify us immediately of your determination, the reasons therefor, and the right to appeal any adverse determination to the head of the agency or his or her designee. 5 U.S.C. § 552(a)(6)(i). Please also produce all responsive records in an electronic format (“pdf” is preferred), if convenient. We also are willing to accept a “rolling production” of responsive records if it will facilitate a more timely production.

Judicial Watch also requests a waiver of both search and duplication fees. We are entitled to a waiver of search fees because we are a “representative of the news media.” See 5 U.S.C. § 552(a)(4)(A)(ii)(II); see also *Cause of Action v. Federal Trade Comm.*, 799 F.3d 1108 (D.C. Cir. 2015); *Nat’l Sec. Archive v. U.S. Dep’t of Defense*, 880 F.2d 1381 (D.C. Cir. 1989). For more than thirty years, Judicial Watch has used FOIA and other investigative tools to gather information about the operations and activities of government, a subject of undisputed public interest. Our investigators submit hundreds, if not thousands of FOIA requests annually and receive thousands if not tens of thousands of pages of responsive records. Our experienced journalists and professional writers on staff and under contract use their editorial skills to turn this raw information into distinct works that we disseminate to the public via our weekly email update, which has over 7 million subscribers, and our monthly newsletter, which has a circulation of over 650,000. We also produce weekly videos in our own, in-house studio in which we present our work to the public, as well short-form videos and longer, in-depth video programs. These videos may be viewed on our website, www.judicialwatch.org, and our YouTube page. As of November 2024, our social media presence included over 7 million Facebook followers, over 2.1 million X followers, nearly 1 million Instagram followers, over 800,000 Truth Social followers, and over 530,000 YouTube subscribers. We also produce investigative bulletins, special reports, and the award-winning Corruption Chronicles blog, available at www.judicialwatch.org/corruptionchronicles. In addition, we have authored several books, including *Rights and Freedoms in Peril* by Tom Fitton (Threshold Editions, Oct. 15, 2024), *A Republic Under Assault* by Tom Fitton (Threshold Editions, May 17, 2022), *Clean House* by Tom Fitton (Threshold Editions, Aug. 30, 2016), and *Corruption Chronicles* by Tom Fitton (Threshold Editions, July 24, 2012). In 2012, we produced a documentary film, “District of Corruption,” directed by Stephen K. Bannon. Our “news media” status has been confirmed in

court rulings. *See, e.g., Judicial Watch, Inc. v. U.S. Dep't of Defense*, 2006 U.S. Dist. LEXIS 44003, *1 (D.D.C. June 28, 2006); *Judicial Watch, Inc. v. U.S. Dep't of Justice*, 133 F. Supp.2d 52 (D.D.C. 2000). As a tax exempt, 501(c)(3) non-profit corporation, we have no commercial interests and do not seek the requested records for any commercial use. Rather, we intend to use the requested records as part of our on-going investigative journalism and public education efforts to promote integrity, transparency, and accountability in government and fidelity to the rule of law.

Judicial Watch also is entitled to a waiver of both search fees and duplication fees because “disclosure of the information is in the public interest.” 5 U.S.C. § 552(a)(4)(A)(iii). Disclosure of the requested records undoubtedly will shed light on “the operations or activities of the government.” *Cause of Action*, 799 F.3d at 1115 (quoting 5 U.S.C. § 552(a)(4)(A)(iii)). Disclosure also is “likely to contribute significantly to the public understanding” of those operations or activities because, among other reasons, Judicial Watch intends to disseminate both the records and its findings to “a reasonably broad audience of persons interested in the subject” via its newsletter, email updates, investigative bulletins, website, blog, and its other, regular distribution channels. *Cause of Action*, 799 F.3d at 1116 (quoting *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 815 (2d Cir. 1994)). Again, Judicial Watch does not seek the requested records for any commercial benefit or for its own “primary” benefit, but instead seeks them as part of its ongoing investigative journalism and public education efforts to promote integrity, transparency, and accountability in government and fidelity to the rule of law.

In the event our request for a waiver of search and/or duplication costs is denied, Judicial Watch agrees to pay up to \$300.00 in search and/or duplication costs. Judicial Watch requests that it be contacted before any such costs are incurred, in order to prioritize search and duplication efforts.

If you do not understand this request or any portion thereof, or if you feel you require clarification of this request or any portion thereof, please don't hesitate to contact me at (b)(6) or (b)(6) or sdunagan@judicialwatch.org.

Thank you for your cooperation.

Sincerely,

Sean Dunagan
Judicial Watch, Inc.