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From: [Zack Kopplin](#)  
To: [FOIA](#)  
Subject: FOIA  
Date: Wednesday, July 19, 2017 1:41:53 PM

## Government Accountability Project

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225-715-5946

### FOIA Request

Dear Freedom of Information Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I am requesting any and all documents, including, but not limited to, notes, e-mails, memos, or any other materials concerning pledges, oaths, requests or agreements, oral or written, not to disclose information or documents, or pledges, oaths, requests or agreements, oral or written, having to do with loyalty, allegiance, or similar concepts, made to the President, the Vice President, the Office of the President or the Office of the Vice President, or any individual working in the White House or the White House Compound by any and all current and former members of the FTC's leadership team according to the FTC's website, including, when applicable, but not limited to, the Commissioners, Acting Chairman, Chief of Staff, and Inspector General, along with the leadership team's senior staff, since Nov. 9, 2016.

(If you need clarity about this request, I'm looking for analogs in your agency to the memos that former FBI Director James Comey wrote about a personal loyalty pledge that the President asked him to give.)

Thank you very much for your assistance.

If any of the material covered by this request has been destroyed or removed, please provide all surrounding documentation including, but not limited to, a description of the action taken regarding the materials and justification for those actions taken.

For any documents or portions you deny due to a specific FOIA exemption, please provide a detailed justification of your grounds for claiming such exemption, explaining why the exemption is relevant to the document or portion of the document withheld.

The Government Accountability Project requests that all fees incurred in connection with the attached request be waived, because "disclosure of the information is in the public interest and is not primarily in the commercial interest of the requester." 5 U.S.C. §552 (a)(4)(A)(iii).

The disclosure is "likely to contribute" to an understanding of government operations or activities,

because it will educate the public about the agency's relationship to the Executive Branch.

### The Government Accountability Project's Public Interest Status and History

GAP is a non-profit, non-partisan, public interest organization chartered under IRS Code §501 (C)(3) as a non-profit, educational and charitable organization. We seek to serve the public through achieving governmental accountability by protecting and encouraging federal and corporate employees who observe or are victimized by wrongdoing, gross waste of public funds, threats to public health and safety, environmental contamination, corruption, abuse of the public trust and other abuses of power.

GAP accomplishes these goals primarily by conducting advocacy campaigns before Congress, through the media, and for the general public and by providing legal representation to whistleblowers to combat the retaliation they have suffered in exercising their right of occupational free speech. Our twin aims are to promote corporate and government accountability and to expose, investigate, and correct substantive problems that formed the basis of protected whistleblowing disclosures. GAP's role is well-recognized by the courts and, as an organization, has informational standing under the First Amendment protecting its receipt of disclosed information. *Taylor v. RTC*, 56 F.3d 1437 (D.C. 1995); *United States v. Garde*, 573 F. Supp. 604 (D.D.C. 1987); ~ *Generally Virginia Pharmacy Bd. v. Virginia Consumer Council*, 425 U.S. 748, 756-57 (1976).

GAP has a 20-year history of working in the public interest. GAP does not take individual cases based on the client's ability to pay, how much money GAP believes it can recover in legal fees through litigation or any other commercial interest. Rather, GAP takes cases of legitimately harassed whistleblowers, often pro-bono (without charge), that further public policy or legislative changes that make the law stronger for workers who witness and choose to tell the truth about corporate and taxpayer-financed wrongdoing and to pursue exposure and resolution of the wrongdoing. It is through this work and with the help of whistleblowers that GAP has, among other things, pushed for enactment of several whistleblower protection statutes, exposed unhealthy food at supermarket chains, pushed for independent reviews of the safety of the Alaska pipeline, exposed the threat of explosion in waste tanks at the Hanford nuclear site, and pushed for policy reform within numerous executive agencies. All this activity is done primarily with the interest of the public in mind.

### Non-commercial use of the Requested Information

Disclosure of this information by GAP is in no way connected with any commercial interest since GAP is a non-profit, tax-exempt organization under § 501 (c)(3) of the IRS Code. The information we are seeking is crucial to advance public knowledge and will not be put to any commercial use.

We will work with your office to prioritize responsive data for this request, further refine the request if you find any terms too imprecise, conduct searches for unclassified responsive records, or engage in any other reasonable activities that would lessen the agency's burden and costs.

Please begin working on the request while processing the request for a fee waiver. If you disallow my fee-waiver request, I pledge to pay the price of the FOIA request up to \$25. Alert me if it exceeds

this price.

Thank you in advance for your assistance and cooperation,

Zack Kopplin, Investigator and Outreach Associate  
Government Accountability Project  
225-715-5946