



United States of America  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

BY EMAIL

Abraham Payton  
American Bridge  
455 Massachusetts Ave., Suite 280,  
Washington, DC 20001

APR 13 2016

Re: FOIA-2016-00584  
The Trump Network

Dear Mr. Payton:

This is a final response to your request dated March 07, 2016, under the Freedom of Information Act seeking access to seeking access to copies of all

1. Complaints, charges and petitions involving the Trump Network Ideal Health from 1997 to the present,
2. Investigatory files involving the Trump Network or Ideal Health from 1997 to the present, and
3. Enforcement actions involving the Trump Network or Ideal Health from 1997 to the present.

In accordance with the FOIA and agency policy, we have searched our records as of March 07, 2016, the date we received your request in our FOIA office.

We have located approximately 323 additional pages of responsive records and 7 multimedia records. I am granting partial access to the accessible records. Some of these records and portions of other records fall within the exemptions to the FOIA's disclosure requirements, as explained below.

I am denying access to approximately 270 pages of the responsive records under FOIA Exemption 3, 5 U.S.C. § 552(b)(3), because they are exempt from disclosure by another statute. Specifically, Sections 21(b) and (f) provide that the FTC may not disclose information it obtains in a law enforcement investigation pursuant to compulsory process or voluntarily in lieu thereof. 15 U.S.C. § 57b-2; *see A. Michael's Piano, Inc. v. FTC*, 18 F.3d 138 (2d Cir. 1994).

Some responsive records contain staff analyses, opinions, and recommendations. Those portions are deliberative and pre-decisional and are an integral part of the agency's decision making process. They are exempt from the FOIA's disclosure requirements by FOIA Exemption 5.5 U.S.C. § 552(b)(5). *See NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132 (1975). Additionally, some records contain information prepared by an attorney in contemplation of litigation which is exempt under the attorney work-product privilege. *See Hickman v. Taylor*, 329 U.S. 495, 509-10 (1947).

Some information is exempt from disclosure under FOIA Exemption 7(E), 5 U.S.C. § 552(b)(7)(E). Exemption 7(E) protects information that would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. *See Foster v. DOJ*, 933 F. Supp. 687(E.D. Mich. 1996).

In regards to the enclosed constituent complaint, I am denying access to the constituent's name and address and any other identifying information found in complaint. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this response to your request. Failure to pay this bill promptly will result in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

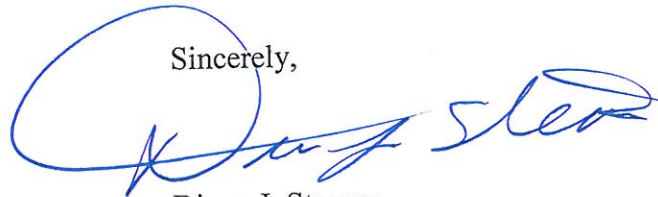
Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Katie Baker at 202-326-2869.

Sincerely,



Dione J. Stearns  
Assistant General Counsel

Att: 20 pages  
Invoice