



July 28, 2025

Andrew Fiorillo,
Acting Chief, Initial Request Staff
Office of the Attorney General
and Office of the Deputy Attorney General
6th Floor
441 G St, NW
Washington, DC 20530-0001

Re: Freedom of Information Act Request

Dear FOIA Officer,

Democracy Defenders Fund ("DDF") respectfully submits the following request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 *et seq.* and Department of Justice ("DOJ") regulations, 28 C.F.R. part 16.

Specifically, DDF requests all records from January 20, 2025, to when this request is processed, of:

1. Records of all communications, including, but not limited to, letters, faxes, emails, voicemails, direct messages, or any form of electronic message, regardless of whether maintained on an official device or account or a personal device or account, that refer to "Jeffrey Epstein" or "Ghislaine Maxwell," or any code name, code word, pseudonym, or cryptonym used for identifying "Jeffrey Epstein" or "Ghislaine Maxwell," that were sent from, received by, or transmitted to any Department of Justice official including, but not limited to, Attorney General Pamela Bondi, Deputy Attorney General Todd Blanche, Principal Associate Deputy Attorney General Emil Bove, FBI Director Kash Patel, and FBI Deputy Director Dan Bongino. This includes any attachments, including, but not limited to, meeting agendas, minutes, notes, memos, briefing materials, drafts, presentations, or analyses created, received, or reviewed by agency personnel. This request includes direct correspondence as well as communications facilitated by or through third parties.
2. Any communications, in any form, including audiovisual media such as digital video, VHS, DVD, or other similar format, discussing or explaining the process of how department officials should approach or address references to Donald Trump or Mar-a-lago appearing in any files related to the Jeffrey Epstein or Ghislaine Maxwell cases, including any communications that describe how to flag, categorize, or memorialize mentions of President Trump. This request includes, but is not limited to, videos circulated on unclassified networks within the Department.

3. Electronic copies of all calendar entries or meeting invitations for any Department officials, including, but not limited to, Attorney General Bondi, Deputy Attorney General Todd Blanche, Principal Associate Deputy Attorney General Emil Bove, FBI Director Kash Patel, or FBI Deputy Director Dan Bongino, including any calendars maintained on their behalf, that reference “Jeffrey Epstein” or “Ghislaine Maxwell” or any code name, code word, pseudonym, or cryptonym used for identifying “Jeffrey Epstein” or “Ghislaine Maxwell”. For any such calendar entries or meeting invites produced, please also provide any related materials, including recordings, transcripts, agendas, minutes, notes, memos, briefing materials, drafts, presentations, or analyses created, received, or reviewed for use during, or in preparation of, such meeting.
4. Any communications, correspondence, or documents listing or containing the identities of people who were clients or associates of Jeffrey Epstein, including any documents listing or containing the identities of people who were invited to Epstein’s properties, including invitations, calendar schedules, and flight logs.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes, without limitation, all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, and anyone who was cc’ed or bcc’ed on any emails.

If it is your position that any portion of the requested records is exempt from disclosure, DDF requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*.¹ If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.² If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document.³ Please be advised that DDF intends to pursue all legal remedies to enforce its right under the FOIA to access these documents. Accordingly, because litigation reasonably is foreseeable, the agency should institute an agency-wide preservation hold on documents potentially responsive to this request.

Fee Waiver Request

Pursuant to 5 U.S.C. 552(a)(4)(a) and 28 C.F.R. 16.10(k), DDF requests a waiver of fees associated with processing this request. Department regulations provide for a waiver of fees when it involves the “disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the

¹ 484 F.2d 820 (D.C. Cir. 1973).

² See 5 U.S.C. § 552(b), <https://crsreports.congress.gov/product/pdf/R/R47984>.

³ See *Mead Data Central v. U.S. Dep’t of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

government and is not primarily in the commercial interest of the requester.”⁴ Courts have found that a fee waiver is appropriate when the disclosure will “(1) shed light on ‘the operations or activities of the government’; (2) be ‘likely to contribute significantly to public understanding’ of those operations or activities; and (3) not be ‘primarily in the commercial interest of the requester.’” DDF’s request meets all elements.⁵

First, the disclosure will shed light on the Department of Justice's possession, retention, handling, and disposition of documents and communications related to criminal activity by Jeffrey Epstein and Ghislaine Maxwell involving illegal sexual activity by Epstein with underage girls, including records the Department may have that name clients and associates of Epstein and records that may name President Trump in relation to these matters. These records may also reveal to the public a potential attempt to cover up negative or potentially criminal conduct, including by President Trump. The existence and extent of such records, and the government’s response to their collection and dissemination, are currently a question of immense media speculation.⁶ In February 2025, Attorney General Bondi said in an interview with Fox News that the Epstein client list was, “sitting on my desk right now to review.”⁷ It was recently reported that Attorney General Bondi assigned nearly 1,000 FBI officials to comb through tens of thousands of pages of documents related to Epstein to flag mentions of the President.⁸ Then in July, the Department issued a memo noting, “this systematic review revealed no incriminating ‘client list.’”⁹ However, the Wall Street Journal has reported that the Attorney General personally briefed the President on instances of his name appearing in documents related to Jeffrey Epstein in May.¹⁰ Given contradictory statements made by the Department, and the fact that President Trump had a prior long-standing friendship with Epstein before it ended in around 2004,¹¹ disclosure of these records would conclusively show whether the Department has the information it now purports that it does not have, and, if such records exist, whether Donald Trump’s name appears in any of the documents related to Jeffrey Epstein. This release is also important to understand whether any undue political influence by the President has affected the Department’s ability or willingness to release documents related to Jeffrey Epstein. Prior to being elected to a second term, the President promised repeatedly during his campaign that he would release these files.¹² Yet, in the face of increased pressure to release the full array of documents, the President has

⁴ 28 C.F.R. 16.10(k)(1).

⁵ *Cause of Action v. FTC*, 799 F.3d 1108, 1115 (D.C. Cir. 2015).

⁶ See Devlin Barrett, *What to Know About the Epstein Files, a Perfect Recipe for Conspiracy Theories*, New York Times (Jul. 18, 2025), <https://www.nytimes.com/article/jeffrey-epstein-files-trump.html>.

⁷ Nadine Yusif, *Trump says US attorney general should release any ‘credible’ information on Epstein*, BBC (Jul. 16, 2025), <https://www.bbc.com/news/articles/ckgl4dl334go>.

⁸ Alexander Bolton, *Durbin: FBI Agents were Told to ‘Flag’ Epstein Records that Mention Trump*, The Hill (July 18, 2025), <https://thehill.com/homenews/senate/5409002-trump-epstein-files-ag-bondi-patel-bongino-fbi-agents-durbin-wall-street-journal/>.

⁹ US Department of Justice, *Memo on Epstein Investigation*, Jul. 2025, <https://www.justice.gov/opa/media/1407001/dl?inline>.

¹⁰ Sadie Gurman, et al., *Justice Department Told Trump in May that His Name is Among Many in the Epstein Files*, Wall Street J. (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=hp_trendingnow_article_pos1.

¹¹ Luke Broadwater, *A Timeline of What We Know About Trump and Epstein*, New York Times (Jul. 19, 2025), <https://www.nytimes.com/2025/07/17/us/politics/timeline-trump-epstein.html>.

¹² Tess Owen, *How the Trump administration’s handling of the Epstein files became a vehicle for QAnon*, The Guardian (Jul. 15, 2025), <https://www.theguardian.com/us-news/2025/jul/15/trump-epstein-files-maga>

continued to evade the issue.¹³ Disclosure of these documents is therefore necessary to provide a full record of what communications occurred, and whether any such communications might have resulted in abnormalities in the Department's statements or actions concerning the existence of Epstein's "Client List."

Second, disclosure of the information will significantly aid the public's understanding of the Department's handling of records pertaining to the investigations involving Jeffrey Epstein. President Trump's failure to release the Epstein files has undermined public confidence in the Department's handling of these records because of repeated promises he made to his supporters during the campaign that he would declassify the Epstein files and release the "Epstein client list".¹⁴ The Department's handling of the matter has further undermined public confidence by making contradictory statements related to the existence of an Epstein "client list".¹⁵ As noted above, Attorney General Bondi said in an interview with FOX that the Epstein client list was, "sitting on my desk right now to review."¹⁶ Then in July, the Department issued a memo noting, "This systematic review revealed no incriminating "client list."¹⁷ This has caused immense confusion amongst the public, which has been the subject of ongoing new media coverage.¹⁸ Adding to this confusion, the President recently asked the Department of Justice to release grand jury documents related to the prosecution of Jeffrey Epstein, documents that likely will only constitute a small portion of the documents held by the Department.¹⁹ Release of the documents requested is therefore necessary to aid the public in its understanding of the Department's handling of the records and to ensure that the public has access to the full record of relevant documents concerning this investigation.

Third, the purpose of the disclosures is not "primarily in the commercial interest of" DDF. DDF is a nonprofit organization established under section 501(c)(3) of the Internal Revenue Code. DDF's core mission is to defend the rule of law, fight corruption, and protect elections using a variety of tools including publication of information concerning ongoing activities of the government. DDF regularly speaks on issues related to government activities through traditional

¹³ Chris Cameron, Trump Really Wants to Stop Talking About Epstein: A Timeline, NY Times (July 23, 2025), <https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-distraction-timeline.html>.

¹⁴ Tess Owen, *How the Trump administration's handling of the Epstein files became a vehicle for QAnon*, The Guardian (Jul. 15, 2025), <https://www.theguardian.com/us-news/2025/jul/15/trump-epstein-files-maga>.

¹⁵ See, e.g., Alexandra Hutzler, *What Trump has said about Jeffrey Epstein over the years, including on 2024 campaign trail*, ABC News (Jul. 16, 2025), <https://abcnews.go.com/Politics/trump-jeffrey-epstein-years-including-2024-campaign-trail/story?id=123778541>.

¹⁶ Nadine Yusif, *Trump says US attorney general should release any 'credible' information on Epstein*, BBC (Jul. 16, 2025), <https://www.bbc.com/news/articles/ckgl4dl334go>.

¹⁷ US Department of Justice, Memo on Epstein Investigation, Jul. 2025, <https://www.justice.gov/opa/media/1407001/dl?inline>.

¹⁸ See, e.g., Mike Wendling, *Why the Epstein case looms large in MAGA world*, BBC (Jul. 18, 2025) <https://www.bbc.com/news/articles/cy8ge16d2y3o>; Jason Lange, *Trump faces backlash as 69% believe Epstein details concealed, Reuters/Ipsos poll finds*, Reuters (Jul. 17, 2025), <https://www.reuters.com/world/us/trump-faces-backlash-69-believe-epstein-details-concealed-reutersipsos-poll-2025-07-17/>.

¹⁹ Larry Neumesiter, *Request to unseal Epstein grand jury transcripts likely to disappoint, ex-prosecutors say*, AP News (Jan. 20, 2025), <https://apnews.com/article/trump-jeffrey-epstein-grand-jury-justice-department-4634e5afceb8b1bb43f23558dfbb1d6c>.

broadcast media, podcasts, and the issuance of op-eds.²⁰ DDF maintains a dedicated website where it provides information related to its activities, which can be accessed by the public.²¹ The purpose of the disclosure is to inform the public on activities of the government.

In addition, DDF requests waiver of fees related to processing this request as representative of the news media pursuant to 5 U.S.C. 552(a)(4)(A)(ii)(II). DDF routinely collects information of "potential interest to a segment of the public" and "uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience."²² As noted above, DDF maintains a dedicated webpage for informing the public about activities related to government activity through a variety of media, including press releases, public reports, and op-eds. DDF experts routinely engage with the public and with other members of the new media to publicize important information, including information related to government activities. Pursuant to existing case law, DDF clearly meets the criteria for a fee waiver under section 552(a)(4)(A)(ii)(II).

Request for Expedited Processing

In addition, DDF also provides the following amended supplemental information concerning its request for expedited processing:

DDF has requested expedition of this request because:

- 1. The request concerns an urgency to inform the public about an actual or alleged Federal Government activity, and DDF is primarily engaged in disseminating information concerning that activity.**

Department regulations provide for expedited processing of any request involving an "urgency to inform the public about an actual or alleged Federal government activity, if made by a person who primarily engaged in disseminating information." 5 C.F.R. 16.5(e)(1)(ii). The outrageous nature of the alleged activity engaged in by Epstein and the failure of the Department to release the files, after both the President and his Attorney General promised to do so, has caused his supporters, the media and the general public much outrage and alarm. The failure to release the documents raises questions about whether President Trump's name may appear in the files due to his past relationship with Epstein,²³ and if so, whether that may be hindering public disclosure. Because this topic is of significant public importance—and the President already appears to be evading disclosure through many public comments²⁴—under FOIA's expedited processing

²⁰ See e.g., Virginia Canter, et al., *Why we 'Democracy Defenders' are demanding information about DOGE*, MSNBC (Dec. 27, 2024, 3:00AM PT), <https://www.msnbc.com/opinion/msnbc-opinion/group-launched-inquiry-musk-ramaswamys-doge-rcna185248>; see also Norman Eisen, Virginia Canter, and Richard Painter, *A Plane from Qatar? C'Mon, Man!*, New York Times (May 14, 2025), <https://www.nytimes.com/2025/05/14/opinion/trump-plane-qatar-crypto.html>.

²¹ See <https://www.democracydefendersfund.org/news-resources>.

²² *Nat'l Sec. Archive v. Dept. of Def.*, 880 F.2d 1381, 1387 (D.C. Cir. 1989).

²³ Mike Baker and Michael S. Schmidt, *An Accuser's Story Suggests How Trump Might Appear in the Epstein Files*, The New York Times (July. 20, 2025), <https://www.nytimes.com/2025/07/20/us/politics/epstein-employee-trump-investigation.html>.

²⁴ See, e.g., Stephen Fowler, *Trump tells supporters not to 'waste time' on Epstein files. They're not happy*, NPR (Jul. 15, 2025), <https://www.npr.org/2025/07/14/nx-s1-5467151/trump-epstein-files-doj-fbi-maga>.

provisions, this request is of the utmost urgency and any delay will deprive the public of timely information necessary to evaluate the government's handling of records pertaining to these investigations.

DDF's public dissemination and media outreach are extensive, allowing it to connect with a vast and diverse audience across various platforms, making it uniquely positioned to effectively inform the public about the findings of this request.²⁵ Through a combination of investigative reports, in-depth analyses, press releases, and dynamic engagement on multiple digital and traditional media channels, DDF ensures that critical information reaches a wide spectrum of stakeholders, from policymakers and advocacy groups to individual citizens seeking accountability in government operations.²⁶ This multifaceted approach amplifies the impact of the information obtained and facilitates informed public discourse on pressing issues.

DDF's communications infrastructure is robust and designed to maximize reach and engagements. With a significant presence across social media platforms, and targeted outreach initiatives, DDF has built a network capable of rapidly disseminating accurate and detailed information regarding government activities. By making these findings relatable and understandable, DDF not only informs but empowers the public to participate meaningfully in conversations about governance and accountability. The necessity of expediting the production of responsive records is underscored by DDF's proven capacity to reach a wide audience and spark meaningful public dialogue.

2. The request involves a matter of widespread and exceptional media interest involving questions about the President's integrity which affect public confidence.

DDF requests expedited processing as well under 28 C.F.R. 16.5(e)(1)(iv), which provides that the Department will process requests on an expedited basis if it involves "A matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence."

There is no question that the Department's handling of the Epstein files has generated exceptional widespread media interest. For example, news and media outlets, including Fox

²⁵ See e.g., Virginia Canter, et al., *Why we 'Democracy Defenders' are demanding information about DOGE*, MSNBC (Dec. 27, 2024, 3:00AM PT), <https://www.msnbc.com/opinion/msnbc-opinion/group-launched-inquiry-musk-ramaswamys-doge-rcna185248>; see also David A. Fahrenthold, *Two Watchdogs Were Rebuffed From Joining Trump's Cost-Cutting Effort*, The New York Times (Jan. 16, 2025), <https://www.nytimes.com/2025/01/16/us/doge-trump-watchdogs.html>; see also Stephen M. Lepore, *DOGE'S brutal response to former Obama and Clinton aides attempting to join Elon Musk's cost cutting machine*, Daily Mail (Jan. 17, 2025, 1:31 EST), <https://www.dailymail.co.uk/news/article-14295275/DOGE-brutal-response-former-Obama-Clinton-aides-Elon-Musk.html>; see also Travis Gettys, *'Too many to enumerate': Watchdogs open probe into Musk's alleged 'conflicts of interest'*, Rawstory (Dec. 27, 2024), <https://www.rawstory.com/musk-doge-ethics/>.

²⁶ State Democracy Defenders Fund, <https://statedemocracydefenders.org/fund/> (last visited Jan. 23, 2025)

News,²⁷ New York Times,²⁸ Wall Street Journal,²⁹ and Washington Post,³⁰ have all released multiple stories related to the failure of the Department to release the Epstein files. Influential podcasters like Joe Rogan have not only attacked FBI officials for withholding the files, but specifically noted how "cynical" people have become as a result of the Department's failure to release them.³¹

The extensive media coverage serves as both evidence of widespread concern and a stark reminder of what's missing. The requested documents are essential for ensuring the public remains informed. As noted, DDF has a proven ability to reach broad and diverse audiences, which positions this organization as a key disseminator of this missing information. These insights are especially critical given our extensive knowledge of government corruption and malfeasance.

Immediate compliance with this FOIA request is necessary not only to uphold legal obligations under FOIA but also to address the growing demand for transparency on an issue of national importance that has captured significant national attention. The government's credibility depends on its willingness to timely meet this demand and to allow the public to scrutinize its actions through the lens of complete and accurate information.

²⁷ Ashley Oliver, *10 reasons the DOJ and FBI face backlash over Epstein files flop*, Fox News (July 10, 2025), <https://www.foxnews.com/politics/10-reasons-doj-fbi-face-backlash-over-epstein-files-flop>; Jacqui Heinrich, *Trump taking hits at mountain of Republicans pushing for Epstein file release*, Fox News (July 16, 2025), <https://www.foxnews.com/video/6375808075112>; <https://www.foxnews.com/video/6375726865112>.

²⁸ Luke Broadwater, *Trump Talks About Anything but Epstein on His Social Media Account*, The New York Times (July 21, 2025), <https://www.nytimes.com/2025/07/21/us/politics/trump-epstein-social-media.html>; Erica L. Green, *How Trump Deflected MAGA's Wrath Over Epstein, at Least for Now*, The New York Times (July 21, 2025), <https://www.nytimes.com/2025/07/21/us/politics/trump-epstein-maga-base.html>;

Michael Gold, *Republicans and Democrats Call for More Information on Epstein Case*, New York Times (Jul. 20, 20225), <https://www.nytimes.com/2025/07/20/us/politics/trump-epstein-files.html>.

²⁹ Natalie Andrews, Annie Linskey, and Sadie Gurman, *Trump Calls for Release of "Pertinent" Epstein Grand Jury Material Following WSJ Article*, Wall St. Journal (Jul. 18, 2025), https://www.wsj.com/politics/policy/trump-calls-for-release-of-epstein-documents-following-wsj-article-bc3c3a2b?gaa_at; Annie Linskey and Jasmine Li, *Trump Lashes Out at Supporters for Fixating on "Epstein Hoax."* Wall St. Journal (Jul. 16, 2025), https://www.wsj.com/politics/policy/trump-jeffrey-epstein-files-supporters-4021019d?gaa_at; Editorial, *No Special Counsel for the Epstein Files*, Wall St. Journal (Jul. 17, 2025), https://www.wsj.com/opinion/jeffrey-epstein-files-special-counsel-donald-trump-karoline-leavitt-885590f9?gaa_at.

³⁰ *Trump's "Epstein Files" Problem*, Washington Post Podcast (Jul. 15, 2025) <https://www.washingtonpost.com/podcasts/post-reports/trumps-epstein-files-problem/>; Jeremy Roebuck and Mark Berman, *Justice Dept. asks court to release Epstein grand jury testimony*, Washington Post (Jul. 18, 2025), <https://www.washingtonpost.com/national-security/2025/07/18/bondi-epstein-files-documents-grand-jury-testimony-doj/>; Sarah Ellison, *How MAGA influencers put pressure on Trump, Bondi over Epstein*, Washington Post (Jul. 19, 2025), <https://www.washingtonpost.com/politics/2025/07/19/maga-influencers-trump-epstein/>;

³¹ Eboni Boykin-Patterson, *Joe Rogan Rips Patel and Bongino for Letting Him Down on Epstein*, The Daily Beast (Jul. 19, 2025), <https://www.thedailybeast.com/joe-rogan-rips-kash-patel-and-dan-bongino-for-letting-him-down-on-epstein/>.

The undersigned hereby certify that these statements submitted supporting DDF's request for expedited processing are true and correct to the best of our knowledge and belief.

Sincerely,

/s/

Ambassador Norman Eisen (ret.)
Executive Chair and Founder

/s/

Virginia Canter
Ethics and Anticorruption Chief Counsel and Director

/s/

Gabriel Lezra
Senior Strategist

CC: Director of Public Affairs, Office of Public Affairs
United States Department of Justice,
950 Pennsylvania Avenue NW.
Washington, DC 20530

Guidance Regarding the Search and Processing of Requested Records:

In connection with this request for records, we provide the following guidance regarding the scope of the records sought and the search and processing of records:

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions.

The 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 the request, the request includes all prior messages sent or received in that email chain, as well as any attachments to the email. I have included potential domain names where possible to aid your search.

Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage agency information electronically and many agencies have adopted the National Archives and Records Administration (NARA) Capstone program, or similar policies. These systems provide options for searching emails and other electronic records in a manner that is reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency's archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; agencies may not have direct access to files stored in .PST files, out of network drives, in paper format, or in personal email accounts.

Please provide the requested documents in the following format: In PDF format, electronically searchable wherever possible;

- Each paper record in a separately saved file;
- 'Parent-child' relationships maintained, meaning that the requester must be able to identify the attachments with emails;
- Any data records in native format (i.e. Excel spreadsheets in Excel);
- Emails should include BCC and any other hidden fields; with any other metadata preserved.

For calendar entries created in Outlook or similar programs, the documents should be produced in "memo" form to include all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars - the request is for the production of any calendar, paper or electronic, whether on government issued or personal devices, used to track or coordinate how these individuals allocate their time on agency business. The search should include any calendars associated with an agency official's individual email account, as well as any official calendars maintained for the official, including by his or her administrative assistant or scheduler.

If it is your position any portion of the requested records is exempt from disclosure, DDF requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.³² If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document.³³ Please be advised that DDF intends to pursue all legal remedies to enforce its right under the FOIA to access these documents. Accordingly, because litigation reasonably is foreseeable, the agency should institute an agency-wide preservation hold on documents potentially responsive to this request.

In the event my fees are not waived, we agree to pay reasonable duplication fees in an amount not to exceed \$100, but I request to be notified before processing incurs expenses in excess of that amount.

If you have any questions about this clarification or foresee any problems in fully releasing the requested records, please contact me at [REDACTED]. Please send the requested records to me at either [REDACTED] or Gabriel Lezra, Democracy Defenders Fund, [REDACTED]. Thank you for your assistance in this matter.

Sincerely,

/s/

Ambassador Norman Eisen (ret.)
Executive Chair and Founder

/s/

Virginia Canter
Ethics and Anticorruption Chief Counsel and Director

/s/

Gabriel Lezra
Senior Strategist

³² See 5 U.S.C. § 552(b), <https://crsreports.congress.gov/product/pdf/R/R47984>.

³³ See *Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).