IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DEMOCRACY FORWARD FOUNDATION, P.O. Box 34553 Washington, D.C. 20043, *Plaintiff*, vs. U.S. DEPARTMENT OF JUSTICE 950 Pennsylvania Avenue, NW Washington, DC 20530 FEDERAL BUREAU OF INVESTIGATION 935 Pennsylvania Avenue, NW Washington, DC 20535 *Defendants*.	Case No. 25-cv- 2597

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation ("DFF") brings this action against Defendants U.S. Department of Justice ("DOJ") and the Federal Bureau of Investigation ("FBI") to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). Plaintiff alleges as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

2. Venue is proper under 28 U.S.C. § 1391(e), as Defendants' headquarters are located in Washington, D.C., within this district, and a substantial part of the events or omissions giving rise to Plaintiff's claims occurred here.

Parties

3. Plaintiff DFF is a not-for-profit organization incorporated under the laws of the District of Columbia and based in Washington, D.C. Plaintiff works to promote transparency and accountability in government, in part, by educating the public on government actions and policies.

4. Defendant DOJ is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. DOJ has possession, custody, and control of records to which Plaintiff seeks access.

5. Defendant FBI is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. FBI has possession, custody, and control of records to which Plaintiff seeks access.

Facts

The Trump Administration's Handling of the "Epstein Files"

6. On July 6, 2019, hedge-fund manager Jeffrey Epstein was arrested on federal charges related to sex trafficking.[1]

7. The unsealed indictment alleged that between 2002 and 2005, Epstein recruited dozens of underage girls to his residences in New York City and Palm Beach, Florida for sexual acts in exchange for money, and often paid them to recruit additional minors to engage in similar sex acts for money.[2]

[1] *See* Margaret Talbot, *The Judicial System Finally Catches up to Jeffrey Epstein*, The New Yorker (Jul. 10, 2019), https://www.newyorker.com/news/daily-comment/the-judicial-system-finally-catches-up-to-jeffrey-epstein.

[2] *See* Press Release, U.S. Attorney's Off. for the S. Dist. of N.Y., *Jeffrey Epstein Charged in Manhattan Federal Court with Sex Trafficking of Minors*, U.S. Dep't of Just. (Jul. 8, 2019), https://www.justice.gov/usao-sdny/pr/jeffrey-epstein-charged-manhattan-federal-court-sex-trafficking-minors.

8. Epstein pled not guilty but died by suicide in jail on August 10, 2019.[3]

9. On August 29, 2019, the indictment against Epstein was dismissed in light of his death.[4]

10. On December 29, 2021, Epstein's ex-girlfriend, Ghislaine Maxwell, was convicted of conspiring with Epstein to traffic girls for sex[5] and is currently serving a 20-year sentence in federal prison.[6]

11. In January 2024, unsealed court documents disclosed the names of dozens of powerful men with alleged connections to Epstein, including President Donald J. Trump, British Royal Prince Andrew, former President Bill Clinton, lawyer Alan Dershowitz, and others.[7]

12. This and other information raise persistent questions about what the government uncovered during the years of investigation into Epstein's criminal activity. Accordingly, there is

[3] *See* Sarah N. Lynch, *Disgraced money manager Jeffrey Epstein dead in apparent suicide*, Reuters (Aug. 10, 2019), https://www.reuters.com/article/world/disgraced-money-manager-jeffrey-epstein-dead-in-apparent-suicide-idUSKCN1V00GZ/; *see also* Press Release, DOJ Off. of the Inspector Gen., *DOJ OIG Releases Report on the BOP's Custody, Care, and Supervision of Jeffrey Epstein at the Metropolitan Correctional Center in New York, New York* (June 27, 2023), https://oig.justice.gov/news/doj-oig-releases-report-bops-custody-care-and-supervision-jeffrey-epstein-metropolitan.

[4] *See* U.S. Atty's Off. for the S. Dist. of N.Y., *United States v. Jeffrey Epstein, 19 Cr. 490 (RMB) – Victim-Witness Services*, U.S. Dep't of Just., https://www.justice.gov/usao-sdny/programs/victim-witness-services/united-states-v-jeffrey-epstein-19-cr-490-rmb (last visited Aug. 1, 2025).

[5] Luc Cohen et al., *Ghislaine Maxwell Convicted of Recruiting Teenage Girls for Epstein Sex Abuse*, Reuters (Dec. 30, 2021), https://www.reuters.com/world/us/maxwell-jury-resume-deliberations-after-judge-warns-omicron-risk-2021-12-29/.

[6] Luc Cohen et al., *Ghislaine Maxwell sentenced to 20 years for 'horrific' sex trafficking*, Reuters (June 28, 2022), https://www.reuters.com/legal/government/ghislaine-maxwell-be-sentenced-sex-trafficking-conviction-2022-06-28/.

[7] Brian Mann, *Court documents reveal names of powerful men allegedly linked to Jeffrey Epstein*, NPR (Jan. 4, 2024), https://thepublicsradio.org/npr/court-documents-reveal-names-of-powerful-men-allegedly-linked-to-jeffrey-epstein-77.

broad-based public pressure for the government to release that information by disclosing records that are often referred to as the "Epstein files."[8]

13. There is widespread public speculation that the Epstein files contain a roster of powerful clients to whom Epstein trafficked underaged girls. This list has become known as the "Epstein list" or the "client list."[9]

14. Giving credence to this theory, in 2024, then Presidential candidate Trump said in an interview that as President, he would "probably" release the "Epstein list":

> [Interviewer]: It's just very strange for a lot of people, that the list of clients that went to [Epstein's private] island has not been made public.
>
> [Then Presidential candidate Trump]: It's very interesting, isn't it? It probably will be, by the way, probably.[10]

15. Following President Trump's reelection and Inauguration, when asked in a televised interview on February 21, 2025, whether DOJ would "really" "be releasing the list of

[8] *See e.g.*, Nik Popli, *These House Republicans Want All of the Epstein Files Released*, TIME (Jul. 21, 2025), https://time.com/7304138/epstein-files-house-republicans/; Chantelle Lee, *Democratic Congressman Introduces Resolution Demanding Trump Release Epstein Files: 'I'm Very Concerned About the Way They Handled This Case*," TIME (Jul. 14, 2025), https://time.com/7302296/jeffrey-epstein-files-trump-marc-veasey;
Kenneal Patterson, *Trump Savages MAGA 'Lunatics' Demanding More Epstein Files*, The Daily Beast (Jul. 19, 2025), https://www.thedailybeast.com/trump-savages-lunatics-demanding-epstein-files-release/; Jordana Comiter, *What Are the Epstein Files? Everything to Know About the Classified Documents Related to Jeffrey Epstein's Criminal History*, People (Jul. 30, 2025), https://people.com/what-are-the-epstein-files-11781622.

[9] *See* Devlin Barrett et al., *What to Know About the Epstein Files, a Perfect Recipe for Conspiracy Theories*, N.Y. Times (Jul. 28, 2025), https://www.nytimes.com/article/jeffrey-epstein-files-trump.html.

[10] Lex Fridman, *Transcript for Donald Trump Interview*, at 44:59-45:13 (Sept. 3, 2024), https://lexfridman.com/donald-trump-transcript#chapter16_jeffrey_epstein.

Jeffrey Epstein's clients," Attorney General Pam Bondi replied: "It's sitting on my desk right now to review. That's been a directive by President Trump."[11]

16. Days after Attorney General Bondi publicly stated the Epstein client list was "sitting on [her] desk" for review, DOJ released "[t]he first phase of declassified [Epstein] files," which contained no "client list," but rather—by DOJ's own characterization—comprised mostly materials that were already publicly available.[12]

17. Media outlets report that what ensued over the next few months was a "frantic scouring" of the Epstein files by the FBI and DOJ, for among other things, any references to President Trump.[13]

18. A team of FBI employees was reportedly tasked with redacting references to President Trump in the files and found "numerous references."[14]

19. Media outlets further report that this review was largely completed by mid-April and that shortly thereafter, Attorney General Bondi briefed President Trump that his name appeared in the Epstein files.[15]

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[11] Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, FOX News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files.

[12] Press Release, U.S. Dep't of Just., *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files* (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files (stating "[t]he first phase of declassified files largely contains documents that have been previously leaked but never released in a formal capacity by the U.S. Government").

[13] Adam Goldman et al., *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, N.Y. Times (Jul. 24, 2025), https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html.

[14] *See* Jason Leopold, *FBI Redacted Trump's Name in Epstein Files for Privacy Reasons*, Bloomberg (Aug. 1, 2025), https://www.bloomberg.com/news/articles/2025-08-01/fbi-redacted-president-donald-trump-s-name-in-the-epstein-files.

[15] *See, e.g.*, Sadie Gurman et al., *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, Wall Street Journal (Jul. 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-

20. On July 7, 2025, the DOJ and FBI issued a memo concluding review of the Epstein files for additional disclosures. The memo stated that after "systematic review" of the Epstein files there was "no incriminating 'client list'" or "evidence that could predicate an investigation against uncharged third parties." The memo stated that "no further disclosure" of information regarding Epstein "would be appropriate or warranted."[16]

21. On July 17, 2025, *The Wall Street Journal* reported that President Trump had sent Epstein a "bawdy" letter in 2003 for his 50th birthday that included a sketch of a naked woman and an opaque reference to secrets they shared.[17]

22. *The Wall Street Journal* article contained a quote that Mr. Trump gave to *New York Magazine* for a 2002 profile of Epstein:

> I've known Jeff for fifteen years. Terrific guy. He's a lot of fun to be with. It is even said that he likes beautiful women as much as I do, and many of them are on the younger side.[18]

23. President Trump is suing *The Wall Street Journal* for libel over this reporting.[19]

24. On July 23, *The Wall Street Journal* further reported—for the first time—that Attorney General Bondi had informed President Trump in May that his name was in the Epstein files.[20]

727a8038?mod=author_content_page_1_pos_1; Maggie Haberman et al., *Attorney General Told Trump His Name Appeared in Epstein Files*, N.Y. Times (Jul. 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-files-named.html.

[16] FBI Memo, July 2025, U.S. Dep't of Just. https://www.justice.gov/opa/media/1407001/dl?inline (last visited Aug. 1, 2025).

[17] Khadeeja Safdar et al., *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, Wall St. J. (Jul. 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common.

[18] *Id.*

[19] Nandita Bose et al., *Trump sues Wall Street Journal over Epstein report, seeks $10 billion*, Reuters (Jul. 19, 2025), https://www.reuters.com/world/us/trump-sues-wall-street-journal-over-epstein-report-seeks-10-billion-2025-07-19.

[20] Gurman, *supra* note 15.

25. On July 24 and 25, 2025, despite DOJ and the FBI publicly concluding review of the Epstein files via the July 7 memo, Deputy Attorney General Todd Blanche met with Epstein's currently incarcerated co-conspirator Ghislaine Maxwell at the U.S. Attorney's Office in Tallahassee, Florida.[21]

26. Media outlets report that DOJ granted Maxwell limited immunity to talk "freely" with Deputy Attorney General Blanche during the two days of interviews.[22]

27. On August 1, 2025, the Trump Administration transferred Maxwell to a lower security prison in Texas.[23]

28. President Trump has repeatedly refused to rule out granting clemency to Maxwell.[24]

29. Since the Inauguration, the media has frequently reported on President Trump's reversal in position regarding the Epstein files, apparent conflicts of interest, and a corresponding erosion of public trust.[25]

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[21] Andrew Skerritt et al., *Epstein associate Ghislaine Maxwell to meet with deputy attorney general again today*, Wash. Post (Jul. 25, 2025), https://www.washingtonpost.com/national-security/2025/07/24/justice-todd-blanche-epstein-ghislaine-maxwell-trump/.

[22] *See, e.g.*, Aaron Katersky et al., *Ghislaine Maxwell Received Limited Immunity During Meetings with Deputy Attorney General: Sources*, ABC News (Jul. 25, 2025), https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story?id=124064062.

[23] Solcyré Burga, *Sex Trafficker Ghislaine Maxwell Moved to Minimum Security Prison a Week After Meeting With Trump DOJ*, TIME (Aug. 1, 2025), https://time.com/7306977/ghislaine-maxwell-epstein-prison-texas.

[24] *See, e.g.*, Brian Bennett, *Trump: Ghislane Maxwell Pardon 'Inappropriate' to Talk About 'Right Now,'* TIME (Jul. 28, 2025), https://time.com/7305903/donald-trump-ghislane-maxwell-pardon; Sarah Ewall-Wice, *Ghislaine Handed DOJ 100 Names in Shameless Pardon Quid Pro Quo*, Daily Beast (Jul. 26, 2025), https://www.thedailybeast.com/ghislaine-handed-doj-100-names-in-brazen-pardon-quid-pro-quo.

[25] *See, e.g.*, MSNBC, *Trump Hedges on Declassifying Epstein Files*, (Jun. 6, 2024), https://www.youtube.com/shorts/ZJorAVgHy7Y; Aaron Blake, "*Timeline suggests Trump team changed its tune on Epstein files after Trump was told he was in them*," CNN (Jul. 24, 2025), https://www.cnn.com/2025/07/24/politics/trump-epstein-files-pivot-timeline; *DOJ faces credibility questions as it investigates Jeffrey Epstein*, NPR (Jul. 25, 2025), https://www.whro.org/2025-07-25/doj-faces-credibility-questions-as-it-investigates-jeffrey-epstein; Philip Rotner, *Why the Huge Conflicts of Interest Among Trump's Epstein Team Matter*,

DFF's FOIA Requests

30. To shed light on the Trump Administration's handling of the Epstein matter, DFF submitted several FOIA requests to the DOJ and FBI seeking senior Administration officials' communications regarding the Epstein matter, including those regarding correspondence between President Trump and Epstein, as well as records concerning agency review of the Epstein matter.

31. In connection with each FOIA request (described in detail *infra*), on July 28, 2025, DFF submitted a request for expedited processing, along with copies of its FOIA requests, directly to DOJ's: (1) Mail Referral Unit ("MRU"); (2) Office of Information Policy ("OIP")[26]; (3) Executive Office for U.S. Attorneys ("EOUSA"); (4) Criminal Division ("CRM"); and (5) the FBI. Exhibit ("Ex.") 1.

32. In filing these requests, DFF argued expedition is justified: (1) under 28 C.F.R. § 16.5(e)(1)(iv), because DFF's FOIA requests concern a "matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence"; and (2) under 5 U.S.C. § 552(a)(6)(E)(v)(II), because there is an urgency to inform the public concerning actual or alleged Federal Government activity.

The Bulwark (Jul. 25, 2025), https://www.thebulwark.com/p/why-the-huge-conflicts-of-interest-trump-epstein-lawyers-bondi-blanche-ghislaine-maxwell; *63% of Voters Disapprove of The Trump Administration's Handling Of The Jeffrey Epstein Files*, Quinnipiac University National Poll (Jul. 16, 2025), https://poll.qu.edu/poll-release?releaseid=3928; David Morgan, *Epstein furor undermines public trust, Republican election hopes, two US lawmakers say*, Reuters (Jul. 27, 2025), https://www.reuters.com/world/us/epstein-furor-undermines-public-trust-republican-election-hopes-two-us-lawmakers-2025-07-28/; Chris Cameron, *Trump Really Wants to Stop Talking About Epstein: A Timeline*, N.Y. Times (Jul. 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-distraction-timeline.html; Hady Mawajdeh et al., *Why doesn't Donald Trump want to release the Epstein Files?*, Vox (Jul. 17, 2025), https://www.vox.com/today-explained-podcast/419905/jeffrey-epstein-files-client-list-donald-trump-pam-bondi.

[26] DFF submitted its requests for expedited processing to OIP because OIP handles requests for the records of the Offices of the Attorney General and Deputy Attorney General, which DFF determined likely to have records responsive to the attached requests, and because it handles requests to the Office of Public Affairs, which is involved in expedited processing determinations.

33. Regarding 28 C.F.R. § 16.5(e)(1)(iv), DFF's requests for expedited processing included more than forty articles on the Trump Administration's handling of the Epstein matter—the topic of DFF's FOIA requests—demonstrating that DFF's FOIA requests concern a matter attracting widespread and exceptional media interest. These articles also demonstrate that there exist possible questions about the government's integrity that affect public confidence arising from the Administration's handling of the Epstein matter.[27] Ex. 1.

34. Regarding 5 U.S.C. § 552(a)(6)(E)(v)(II), DFF's requests for expedited processing stated that there is not only an extraordinary need to inform the public about the Trump Administration's handling of the Epstein matter, but there is also a current exigency in light of pending governmental decisions that could occur in short order. Ex. 1.

35. Specifically, President Trump has repeatedly refused to rule out granting clemency to Epstein's co-conspirator Ghislane Maxwell,[28] and Deputy Attorney General Todd Blanche granted Maxwell limited immunity in recent discussions with DOJ.[29] Taken together, DOJ may take action with respect to Maxwell's case in a manner that cannot be altered and that could permanently impact Maxwell's willingness to publicly disclose information on the government's handling of the Epstein matter as well as the government's decisions whether to disclose Epstein-related information.

36. DFF further certified its primary engagement in disseminating information, citing numerous news articles in which records obtained by DFF under public records laws have been used to inform the public.

[27] *Supra* note 25.
[28] Bennett, *supra* note 24.
[29] Katersky, *supra* note 22.

37. On August 7, 2025, DOJ's OIP denied DFF's requests for expedited processing under 5 U.S.C. § 552(a)(6)(E)(v)(II). OIP informed DFF that its requests for expedited processing under 28 C.F.R. § 16.5(e)(1)(iv) are "still pending."

38. Also on August 7, 2025, DFF followed up with DOJ and the FBI to reiterate its requests for expedited processing, and to provide evidence of continued, additional media coverage of the Trump Administration's handling of the Epstein matter. On August 8, 2025, CRM responded to this follow-up to state that DFF's requests for expedited processing are still pending.

39. DFF has received no further determination regarding its requests for expedited processing.

DOJ Attorney General's Review Request

40. On July 25, 2025, DFF sent a request to DOJ for the following:

> 1. All materials prepared or compiled by DOJ officials for Attorney General Bondi's review regarding the [Jeffrey] Epstein matter.
>
> 2. All briefing materials (such as memoranda, talking points, or emails summarizing key information) prepared for Attorney General Bondi for her meetings with President Trump regarding the [Jeffrey] Epstein matter, including her May 2025 meeting at the White House.

Ex. 1.

41. Part (1) of the request sought records compiled or prepared from January 20, 2025, until the date of the search. Part (2) of the request sought records compiled or prepared from March 15, 2025 to May 30, 2025.

42. On July 29, 2025, DOJ's MRU acknowledged this request and assigned it tracking number EMRUFOIA072525-6. MRU noted that it had referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

43. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005365.

44. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP.

45. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06131.

46. DFF has received no further communication regarding this request.

DOJ Senior Leadership Communications Request

47. On July 25, 2025, DFF sent a request to DOJ for the following:

> 1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) of (a) the DOJ officials below regarding (b) the [Jeffrey] Epstein matter, including records reflecting correspondence between Trump and Epstein.
>
> DOJ Officials:
> - I. Attorney General Pam Bondi
> - II. Deputy Attorney General Todd Blanche
> - III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
> - IV. Chief of Staff Chad Mizelle
> - V. Anyone serving as Advisor or Senior Advisor to the Attorney General
> - VI. Anyone serving as Chief of Staff to the Deputy Attorney General
> - VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General
>
> 2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the DOJ officials included in Item 1 containing any of the key terms listed below.
>
> Key Terms:
> - I. "Client List"

II. Epstein
III. "Flight Logs"
IV. "Ghislaine Maxwell"
V. Whistleblower

Ex. 1.

48. This request sought all records from January 20, 2025, until the date of the search.

49. On July 29, 2025, DOJ's MRU acknowledged this request and assigned it tracking number EMRUFOIA072525-7. MRU noted that it had referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

50. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005366.

51. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP.

52. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06130.

53. DFF has received no further communication regarding this request.

FBI Senior Leadership Communications Request

54. On July 25, 2025, DFF sent a request to the FBI for the following:

> 1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) of [(a)] the FBI officials below regarding (b) the [Jeffrey] Epstein matter, including records reflecting correspondence between Trump and Epstein.
>
> FBI Officials:
> I. Director Kash Patel
> II. Deputy Director Dan Bongino
> III. Associate Deputy Director J. William Rivers
> IV. Anyone serving as Chief of Staff to the Director

V. Anyone serving as Advisor or Senior Advisor to the Director
VI. Anyone serving as Chief of Staff to the Deputy Director
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Director

2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the FBI officials included in Item 1 containing any of the key terms listed below.

Key Terms:
I. "Client List"
II. Epstein
III. "Flight Logs"
IV. "Ghislaine Maxwell"
V. Whistleblower

Ex. 1.

55. This request sought all records from January 20, 2025 until the date of the search.

56. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request.

57. DFF has received no further communication regarding this request.

FBI Records Review Request

58. On July 25, 2025, DFF sent a request to the FBI for the following:

1. All directives, guidance, and instructions provided from (a) agency political appointees or other leadership to (b) agency personnel designated to the Information Management Division to assist with the Epstein-related records review between March 14, 2025 and March 30, 2025, including "flagging" any reference to President Trump in the records.

2. Records reflecting all staff assigned to review Epstein-related records, such as a list of agent names; calendar entries of participants, or email including email addresses reflecting those staff.

3. All records reflecting all mentions of President Trump within the Epstein-related records review that took place between March 14, 2025 and March 30, 2025.

Ex. 1.

59. This request sought all records from March 14, 2025 until the date of the search.

60. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request.

61. DFF has received no further communication regarding this request.

Communications between DOJ and FBI Request (Defendants DOJ, FBI)

62. On July 25, 2025, DFF sent an identical FOIA request separately to DOJ and the FBI asking that each respectively produce the following:

1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) between or among (a) any of the DOJ officials below and (b) any of the FBI officials below, regarding the Jeffery Epstein matter, including records reflecting correspondence between Trump and Epstein.

<u>DOJ Officials:</u>

I. Attorney General Pam Bondi
II. Deputy Attorney General Todd Blanche
III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
IV. Chief of Staff Chad Mizelle
V. Anyone serving as Advisor or Senior Advisor to the Attorney General
VI. Anyone serving as Chief of Staff to the Deputy Attorney General
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General

<u>FBI Officials:</u>

I. Director Kash Patel
II. Deputy Director Dan Bongino
III. Associate Deputy Director J. William Rivers

IV. Anyone serving as Chief of Staff to the Director
V. Anyone serving as Advisor or Senior Advisor to the Director

2. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) between (a) any of the DOJ or FBI officials below and (b) White House Press Secretary Karoline Leavitt, including any @who.eop.gov email address associated with her, regarding the Jeffrey Epstein matter, including records reflecting correspondence between Trump and Epstein.

DOJ/FBI Officials:

I. Attorney General Pam Bondi
II. Deputy Attorney General Todd Blanche
III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
IV. Chief of Staff Chad Mizelle
V. Anyone serving as Advisor or Senior Advisor to the Attorney General
VI. Anyone serving as Chief of Staff to the Deputy Attorney General
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General
VIII. Director Kash Patel
IX. Deputy Director Dan Bongino
X. Associate Deputy Director J. William Rivers
XI. Anyone serving as Chief of Staff to the Director
XII. Anyone serving as Advisor or Senior Advisor to the Director

Ex. 1.

63. This request sought all records from January 20, 2025, until the date of the search.

64. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request.

65. On July 29, 2025, DOJ's MRU acknowledged this request and assigned it tracking number EMRUFOIA072525-8. MRU referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

66. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005367.

67. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP and the FBI.

68. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06129.

69. DFF has received no further communication regarding this request.

Communications between Trump and Epstein Request (Defendants DOJ, FBI)

70. On July 28, 2025, DFF sent an identical FOIA request separately to MRU, OIP, EOUSA, CRM, and the FBI asking that each respectively produce the following on an expedited basis:

> All records reflecting all correspondence between Donald J. Trump and Jeffrey Epstein.
>
> Ex. 2.

71. This request sought all records from January 1, 1990 until the date of the search. The request noted public reporting indicating that responsive records have likely been reviewed since January 20, 2025, including in March 2025.[30]

[30] *See, e.g.*, Nnamdi Egwuonwu, *FBI Personnel Were Told to Flag Epstein Files Mentioning Trump, Senate Democrat Says*, NBC News (Jul. 18, 2025), https://www.nbcnews.com/politics/congress/fbi-personnel-jeffrey-epstein-files-mentioning-trump-dick-durbin-says-rcna219699.

72. On July 28, 2025, EOUSA acknowledged receipt of DFF's request and assigned it tracking number EOUSA-2025-005320.

73. On July 29, 2025, EOUSA informed DFF that it had assigned DFF's request to the "complex track" for processing and was extending the time limit to respond due to "unusual circumstances."

74. On August 1, 2025, MRU acknowledged this request and assigned it tracking number EMRUFOIA072825-8. MRU noted that it had referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

75. On August 7, 2025, OIP acknowledged receipt of DFF's request and assigned it tracking number FOIA-2025-06100.

76. On August 8, 2025, CRM acknowledged DFF's request and assigned it tracking number CRM- 302323701.

77. DFF has received no further communication regarding this request.

Exhaustion of Administrative Remedies

78. An agency must respond to a request for expedited processing of a FOIA request within 10 calendar days after the date of the request. 5 U.S.C. § 552(a)(6)(E)(ii)(I). An agency's denial or failure to timely respond to a request for expedited processing is subject to judicial review. *Id.* § 552(a)(6)(E)(iii).

79. DFF requested expedited processing for each FOIA request described herein on July 28, 2025. As of the date of the Complaint, Defendants have failed to notify DFF of determinations regarding DFF's requests for expedited processing and have failed to grant

expedited processing.[31] Through Defendant's failure to grant expedited processing, DFF has constructively exhausted administrative remedies and those failures are subject to judicial review.

CLAIM FOR RELIEF

Count 1 (Violation of FOIA, 5 U.S.C. § 552, Failure to Grant Expedited Processing)

1. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

2. By failing to grant Plaintiff's requests for expedited processing on Plaintiff's FOIA requests concerning matters of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence, 28 C.F.R. § 16.5(e)(1)(iv), and national urgent need to inform the public, 5 U.S.C. § 552(a)(6)(E)(iii), Defendants have violated FOIA.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff requests that this Court:

1. Order Defendants to grant Plaintiff's requests for expedited processing and to process Plaintiff's FOIA requests on an expedited basis by providing Plaintiff with a determination and production of non-exempt portions of the requested records as soon as practicable.
2. Award Plaintiff its costs, attorneys' fees, and other disbursements for this action; and
3. Grant any other relief this Court deems appropriate.

[31] As noted, one DOJ component, OIP, has denied DFF's requests for expedited processing in part; the remainder of DFF's expedition requests to OIP are "still pending."

Dated: August 8, 2025

Respectfully submitted,

/s/ *Daniel A. McGrath*

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Exhibit 1

DEMOCRACY FORWARD

July 28, 2025

Department of Justice
Criminal Division
Christina Butler, Chief, FOIA/PA Unit
950 Constitution Ave, NW
Washington, DC 20530-0001
crm.foia@usdoj.gov

Department of Justice
FOIA/PA Mail Referral Unit
Room 115
LOC Building
Washington, DC 20530-0001
MRUFOIA.Requests@usdoj.gov

Department of Justice
Executive Office for United States Attorneys
Arla Witte-Simpson, FOIA Public Liaison
175 N Street, NE, Suite 5.400
Washington, DC 20530
Via online portal

Department of Justice
Office of Information Policy
Andrew Fiorillo, Acting Chief
441 G St, NW, 6th Floor
Washington, DC 20530
DOJ.OIP.FOIA@usdoj.gov

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602
foipaquestions@fbi.gov

RE: Request for Expedited Processing for Recently Submitted Requests

To FOIA Officials:

Democracy Forward Foundation ("DFF") is writing to request the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI") expedite the processing of the FOIA requests submitted on July 25, 2025 and attached herein in Appendix A. These requests seek records, broadly speaking, reflecting (1) the recent review of the Epstein matter case files, (2) the Attorney General's public statements about the contents of the Epstein matter files that she had in her possessions, and (3) communications among high-ranking officials concerning the Epstein matter following intense media coverage and public interest concerning decisions made about the case and the decision not to release files in the matter.

DFF's requests merit expedited processing because: (1) the requests concern a "matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence," *see* 28 C.F.R. § 16.5(e)(iv); and (2) there is

an urgency to inform the public concerning actual or alleged Federal Government activity, *see* 5 U.S.C. § 552(a)(6)(E)(v)(II).

I. DFF's requests concern a matter attracting exceptional media interest in which there exist possible government integrity questions that affect public confidence.

To qualify for expedited processing under 28 C.F.R. § 16.5(e)(iv), the Department of Justice has interpreted subsection (iv) to require that "the same matter that draws widespread and exceptional media interest must be the matter in which there exists possible questions about the government's integrity that affect public confidence." *Am. Oversight v. U.S. Dep't of Just.*, 292 F. Supp. 3d 501, 506 (D.D.C. 2018). DFF's instant FOIA requests satisfy both criteria.

A. DFF's requests concern a matter attracting widespread and exceptional media interest.

The focus of DFF's FOIA requests–the Government's handling of the Jefferey Epstein matter–has garnered immense attention from the American public, congress, and the press. In particular, there has been significant media coverage and public interest surrounding the information contained within Epstein matter case files and whether that information should be disclosed to the public.

In 2024, the media widely reported President Trump's campaign trail comments that he would release files relating to the Jeffery Epstein matter.[1] Following the Inauguration, media reported Trump Administration officials' statements that they would work to release additional information from the files.[2] For example, during an interview with Fox News's 'America Reports,' Attorney General Bondi stated in regards to Epstein's client list: "It's sitting on my desk right now to review." Attorney General Bondi subsequently released hundreds of pages of documents related to the investigation in what the Department referred to as a "first phase." However, much of what was released was already publicly available.[3]

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[1] *See, e.g.*, Lex Fridman, *Transcript for Donald Trump Interview*, (Sept. 3, 2024), https://lexfridman.com/donald-trump-transcript#chapter16_jeffrey_epstein; MSNBC, *Trump Hedges on Declassifying Epstein Files*, (Jun. 6, 2024), https://youtube.com/shorts.

[2] Piers Morgan, *"DISTURBING" Alina Habba on Epstein Files & Tate Brothers + "Putin Lickspittle" George Galloway*, Piers Morgan Uncensored (Feb. 27, 2025), https://youtu.be/D3JzvP87Zu8?feature=shared; Adam Shaw, *Kash Patel Vows to 'Do Everything' To Help GOP Senator Expose Epstein Files*, Fox News (Jan 30, 2025), https://www.foxnews.com/politics/kash-patel-vows-do-everything-help-gop-senator-expose-epstein-files.

[3] Kerry Breen, *Right-Wing Influencers Get Binders Labeled "The Epstein Files," But Downplay Revelations*, CBS News (Feb 27. 2025), https://www.cbsnews.com/news/right-wing-influencers-get-binders-labeled-the-epstein-files-but-downplay-revelations/; Jeremy Roebuck, *Trump DOJ Releases Some Epstein Files, Says There's Little New Info*, The Washington Post (Feb. 27, 2025), https://www.washingtonpost.com/national-security/2025/02/27/jeffrey-epstein-files-doj-pam-bondi/.

DEMOCRACY FORWARD

Media further reported that, following public pressure to release additional information, Attorney General Bondi sent a letter to FBI Director Patel saying she was told by "a source" that thousands of documents that may be relevant were potentially withheld and that the FBI must hand over "the full and complete Epstein files." No additional records were released following the demand letter.[4]

Accordingly, the media widely documented the reported scouring of Epstein records by hundreds of DOJ and FBI employees, who reportedly worked around the clock to find relevant materials, including any mentions of the President.[5] As a result of that search, earlier this month, the DOJ represented that Epstein did not maintain a "client list" and that no additional files would be made public, other than an edited video relating to Epstein's death.[6] Responding to public backlash from this representation, media reported President Trump's subsequent directive that the Attorney General should release any 'credible' information on the Epstein matter.[7] Attorney General Bondi then requested that all pertinent Grand Jury testimony be released, but a judge denied this request.[8]

Finally, media has widely reported that Deputy Attorney General Blanche recently met with Ghislaine Maxwell to discuss information potentially relevant to this matter, sparking speculation about a potential pardon for Maxwell from President Trump.[9] Around the same time, *The Wall Street Journal* reported: first, that President Trump had sent a "bawdy" letter to Epstein for his 50th birthday; and second, that back in May, the Department told President Trump that his name is among many in the Epstein files.[10]

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[4] *See, e.g.*, Roebuck, Id.

[5] *See, e.g.*, Nnamdi Egwuonwu, *FBI Personnel Were Told to Flag Epstein Files Mentioning Trump, Senate Democrat Says*, NBC News (Jul. 18, 2025), https://www.nbcnews.com/politics/congress/fbi-personnel-jeffrey-epstein-files-mentioning-trump-dick-durbin-says; Adam Goldman and Alan Feuer, *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, The New York Times (Jul. 24, 2025), https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html.

[6] Cheyanne Daniels, *Outraged Trump Supporters Not Placated by DOJ's Actions on Epstein,* Politico (Jul. 22, 2025), https://www.politico.com/news/2025/07/22/trump-maga-supporters-epstein-doj; Dhruv Mehrotra, *The FBI's Jeffrey Epstein Prison Video Had Nearly 3 Minutes Cut Out*, WIRED (Jul. 15, 2025), https://www.wired.com/story/the-fbis-jeffrey-epstein-prison-video-had-nearly-3-minutes-cut-out/; Eric Tucker and Alanna Durkin Richer, *Epstein 'Client List' Doesn't Exist, Justice Department Says, Walking Back Theory Bondi Had Promoted*, Associated Press (Jul. 7, 2025), https://apnews.com/article/jeffrey-epstein-justice-department-pam-bondi.

[7] Nadine Yousif, *Trump Says US Attorney General Should Release Any 'Credible' Information on Epstein*, BBC (Jul. 16, 2025), https://www.bbc.com/news/articles.

[8] *See* Jeremy Roebuck, *Judge in Florida Denies Justice Dept. Request to Release Epstein Transcripts*, The Washington Post (Jul. 23, 2025), https://www.washingtonpost.com/national-security/2025/07/23/epstein-transcripts-florida-judge-justice-department/.

[9] *See, e.g.*, Aaron Katersky, Katherine Faulders, Brandon Baur, and Jon Haworth, *Ghislaine Maxwell Received Limited Immunity During Meetings with Deputy Attorney General: Sources*, ABC News (Jul. 25, 2025), https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story.

[10] *See, e.g.*, Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (Jul. 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files; Khadeeja Safdar and Joe

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Though certainly not an exhaustive recitation of all reporting on the Government's handling of the Epstein matter, the above sampling of media reports clearly demonstrates that this issue has attracted widespread and exceptional media interest, highlighting the pressing need for expedited processing of DFF's related FOIA requests.

B. There exist in these media reports questions about the government's integrity that affect public confidence.

Moreover, the widespread media reporting on the Government's handling of the Epstein matter implicates numerous questions about the government's integrity, including whether:

1) Attorney General Bondi misled the American people in representing that the "client list" was on her desk and ready for review or in representing that additional information related to the Epstein matter would be released?[11]

2) The Trump Administration has reversed course on the decision to disclose the Epstein matter files out of a desire to cover-up the content within for political or personal reasons rather than out of a desire to protect traditional law enforcement interests?[12] This concern includes whether the administration reversed course to prevent the release of files that relate to President Trump.

Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (Jul. 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common.

[11] Haley Chi-Sing, "*Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*," FOX News (February 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files; Greta Cross, "*AG Pam Bondi plans to release flight logs, names related to Jeffrey Epstein on Thursday*," USA Today (February 27, 2025), https://www.usatoday.com/story/news/politics/2025/02/27/jeffrey-epstein-flight-logs-names-pam-bondi/80690426007/; Bart Jansen and John Kennedy, "*Bondi pledged 'transparency' on Epstein files, but grapples with how much*," USA Today (July 27, 2025), https://www.usatoday.com/story/news/politics/2025/07/27/pam-bondi-jeffrey-epstein-release-criminal-file/85338256007/; Eric Tucker and Alanna Durkin Richer, "*Mystery surrounds the Jeffrey Epstein files after Bondi claims 'tens of thousands' of videos*," Associated Press (July 1, 2025), https://apnews.com/article/justice-department-jeffrey-epstein-pam-bondi-trump-fa39193d5b5ff91970428bf077a5ce44

[12] Aaron Blake, "*Timeline suggests Trump team changed its tune on Epstein files after Trump was told he was in them*," CNN (July 24, 2025), https://www.cnn.com/2025/07/24/politics/trump-epstein-files-pivot-timeline; Chris Cameron, "*Trump Really Wants to Stop Talking About Epstein: A Timeline*," The New York Times (July 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-distraction-timeline.html; Hady Mawajdeh and Sean Rameswaram, "*Why doesn't Donald Trump want to release the Epstein Files?*," Vox (July 17, 2025), https://www.vox.com/today-explained-podcast/419905/jeffrey-epstein-files-client-list-donald-trump-pam-bondi; Adam Goldman and Alan Feuer, *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, The New York Times (Jul. 24, 2025), https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html; Domenico Montanaro, "*How and why Trump has struggled in dealing with the Epstein files*," NPR (July 25, 2025), https://www.npr.org/2025/07/25/nx-s1-5479144/trump-epstein-files-politics-maga

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3) The Trump Administration's engagement in this matter presents serious conflicts of interest? This includes questions about whether there are conflicts raised through Deputy Attorney General Todd Blanche's questioning of an Epstein co-conspirator after serving as President Trump's personal lawyer and President Trump's contemporaneous refusal to rule out pardoning that co-conspirator.[13]

The government's actions have plainly sparked concern in the public's confidence in the government's handling of this matter, and the questions above concerning the government's integrity have been integral to the significant volume of media reports mentioned above. Polling data shows that the handling of this matter will affect public confidence as a recent poll from CBS-News and YouGov found that 58 percent of respondents say they're following news about the case "somewhat" or "very closely," and additional polling out of Quinnipiac University's National Poll finds that 63 percent of voters disapprove of the Trump administration's handling of the Epstein files matter.[14] This includes some of the Administration's loyal and vocal supporters, including pundit Tucker Carlson who has stated "As someone who voted for the president, campaigned for the president a lot — I'm not attacking the president, but I think even people who are fully on board with the bulk of the MAGA agenda are like, 'This is too much, actually.'"[15] Members of Congress from both parties have also raised concerns about the government's integrity relating to this matter.[16] In a significant move, a House subcommittee

[13] NPR, "*DOJ faces credibility questions as it investigates Jeffrey Epstein*," (July 25, 2025), https://www.whro.org/2025-07-25/doj-faces-credibility-questions-as-it-investigates-jeffrey-epstein; Philip Rotner, "*Why the Huge Conflicts of Interest Among Trump's Epstein Team Matter*," The Bulwark (July 25, 2025), https://www.thebulwark.com/p/why-the-huge-conflicts-of-interest-trump-epstein-lawyers-bondi-blanche-ghislaine-maxwell; Glenn Thrush and Valerie Crowder, "*After Ghislaine Maxwell Interview, Concerns Mount Over Possibility of Pardon*," The New York Times (July 25, 2025), https://www.nytimes.com/2025/07/25/us/politics/ghislaine-maxwell-trump-pardon.html

[14] Ruth Igielnik and Kellen Browning, *Republicans Are Breaking With Trump Over Epstein Files, Polls Show*, The New York Times (Jul. 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/epstein-trump-republicans; Quinnipiac University Poll, *63% Of Voters Disapprove Of The Trump Administration's Handling Of The Jeffrey Epstein Files, Quinnipiac University National Poll Finds; Nearly Half Of Voters Would Consider Joining A Third Party, Just Not One Created By Elon Musk*, (Jul. 16, 2025), https://poll.qu.edu/poll-release?; Anthony Salvanto, Jennifer De Pinto, and Kabir Khanna, *CBS News Poll Finds Support for Trump's Deportation Program Falls; Americans Call for More Focus on Prices*, CBS News (Jul. 20, 2025), https://www.cbsnews.com/news/cbs-news-poll-trump-deportation-program-prices/.

[15] Amber Phillips, *What to Know About the Metastasizing Jeffrey Epstein controversy*, The Washington Post (Jul. 28, 2025), https://www.washingtonpost.com/politics/2025/07/28/epstein-files-trump-what-to-know/.

[16] David Morgan, *Epstein furor undermines public trust, Republican election hopes, two US lawmakers say*, Reuters (July 27, 2025), https://www.reuters.com/world/us/epstein-furor-undermines-public-trust-republican-election-hopes-two-us-lawmakers-2025-07-28/; Sarah Ferris, Annie Grayer, Lauren Fox, and Manu Raju, *The Epstein Files Are Roiling the House GOP, And There's No End In Sight*, CNN Politics (Jul. 24, 2025), https://www.cnn.com/2025/07/24/politics/house-republicans-epstein-trump; Allison Pecorin, Ivan Pereira, and Isabella Murray, *GOP Sen. Thom Tillis Says Epstein Files Could Impact Midterm Prospects*, ABC News (Jul. 23, 2025), https://abcnews.go.com/Politics/tillis-continues-push-trump-administration-release-epstein-files/story

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voted and approved subpoenaing the administration relating to the matter.[17] All of the above highlights that the administration's failure to keep its promise has raised considerable concerns about government integrity and that further scrutiny is expected.[18]

II. There is an urgency to inform the public concerning actual or alleged Federal Government activity.

As an initial point, DFF–as a not-for-profit organization that works to promote transparency and accountability in government–is primarily engaged in disseminating information to the public. DFF is an organization primarily engaged in "disseminating information to the public,"[19] as evidenced by the previous use of public records obtained by DFF in numerous news reports.[20]

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[17] Lauren Peller, John Parkinson, and Jay O'Brien, *Justice Department Faces Subpoena Over Epstein Files by House Oversight Committee*, ABC News (Jul. 23, 2025), https://abcnews.go.com/Politics/house-oversight-committee-issues-subpoena-ghislaine-maxwell/story.

[18] Chris Cameron, *Trump Really Wants to Stop Talking About Epstein: A Timeline*, The New York Times, Anna Commander, *Republican Targeted by Trump Says Epstein Issue 'Not Going To Go Away*, Newsweek (Jul. 23, 2025), https://www.newsweek.com/republican-targeted-trump-says-epstein-issue-not-going-away-2103191; Elizabeth Elkind, *'Not Going Away': Inside the Epstein Drama That's Thrown House GOP Into Chaos*; Fox News (Jul. 22, 2025), https://www.foxnews.com/politics/not-going-away-inside-epstein-drama-thats-thrown-house-gop-chaos; Erin Kelly, *Rep. Thomas Massie: Push for Epstein Records 'Not Going Away,'* Spectrum News 1 (Jul. 23, 2025), https://spectrumnews1.com/ky/louisville/news/2025/07/22/massie-epstein-records; Sacha Pfeiffer and Majd Al-Waheidi, *As Lawmakers Head Into August Recess, The Epstein Controversy Keeps Bubbling*, National Public Radio (Jul. 23, 2025), https://www.npr.org/2025/07/23/g-s1-78982/house-democrats-trump-officials-epstein;

[19] 5 U.S.C. § 552 (6)(E)(v)(II) ("Compelling need" for the purpose of expedited processing mean "with respect to a request made by a person primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged Federal Government activity.").

[20] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails*

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DFF makes records it receives via FOIA requests publicly available and disseminates information about those records requests through its own analysis and products as well as through media outlets.

There is an urgency to inform the public about the Administration's handling of the Epstein matter pursuant to 5 U.S.C. § 552(a)(6)(E)(v)(II), as there is both intense public interest surrounding the Administration's actions, and there are pending governmental decisions that could occur in short order. This creates a current exigency for the public to receive the information requested in advance of those actions.

First, President Trump, as noted above, has repeatedly refused to rule out granting clemency to Epstein's co-conspirator Ghislane Maxwell.[21] This gives rise to serious concerns that clemency, which cannot be revoked, would remove her reasons for sharing information about prominent individuals' involvement in sex trafficking and the government's consequent handling of the prosecution of those crimes–and its decision not to release information about those activities–permanently.

Second, the Deputy Attorney General has quickly begun discussions with Ms. Maxwell, including through an offer of limited immunity.[22] DOJ may, consequently, take action with respect to Ms. Maxwell's case in a manner that cannot be altered later. This could affect Ms. Maxwell's willingness to publicly disclose information about the government's handling of the

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Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857.

[21] *See, e.g.*, Brian Bennett, *Trump: Ghislane Maxwell Pardon 'Inappropriate' to Talk About 'Right Now,'* TIME (July 28, 2025), https://time.com/7305903/donald-trump-ghislane-maxwell-pardon/?utm_source=chatgpt.com; Sarah Ewall-Wice, *Ghislaine Handed DOJ 100 Names in Shameless Pardon Quid Pro Quo*, Daily Beast (July 26, 2025), https://www.thedailybeast.com/ghislaine-handed-doj-100-names-in-brazen-pardon-quid-pro-quo/?utm_source=chatgpt.com.

[22] *Supra* note 9.

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Epstein matter and its decisions not to disclose information about the Epstein matter permanently.

Given this current exigency, it is important for the public to access information about these matters while they can still petition their government leaders and advocate for a different course of action. If action is taken to alter Ms. Maxwell's status before the release of the requested records, information that is critical to the public interest about the government's handling of the Epstein matter may never come to light.

In sum, the release of federal records related to this historic matter are of critical importance. The American public desires to know more about the Administration's actions and if it deliberately attempted to mislead the American public. Given the compelling need for disclosing such information, Democracy Forward Foundation seeks expedited processing for our requests submitted on July 25, 2025.

I certify to the best of my knowledge and belief that the above is accurate and expedited processing is warranted in this matter.

Sincerely,

/s/ Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

Appendix 1. Submitted Requests

DEMOCRACY FORWARD

July 25, 2025

VIA Electronic Delivery

Department of Justice
FOIA/PA Mail Referral Unit
Room 115
LOC Building
Washington, DC 20530-0001
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Department of Justice ("DOJ") produce the following within twenty (20) business days:

1. All materials prepared or compiled by DOJ officials for Attorney General Bondi's review regarding the Jeffery Epstein matter.[1]

On February 21, 2025, during an interview with Fox News's 'America Reports,' Attorney General Bondi stated in regards to Epstein's client list "It's sitting on my desk right now to review…." This request seeks the files that Attorney General Bondi referenced as awaiting her review as well as any other Epstein-related files compiled for her review.[2]

The timeframe for the above search should be records compiled or prepared from January 20, 2025, until the date of the search.

[1] Attorney General Pamela Bondi, Office of Public Affairs, Letter from Attorney General Bondi to FBI Director Patel, Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files.

[2] Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files;

2. All briefing materials (such as memoranda, talking points, or emails summarizing key information) prepared for Attorney General Bondi for her meetings with President Trump regarding the Jefferey Epstein matter, including her May 2025 meeting at the White House.[3]

In May 2025, Attorney General Bondi and Deputy Attorney General Blanche informed the president at a meeting in the White House that his name was in the Epstein files, according to reporting from the Wall Street Journal.

The timeframe for the above search should be records compiled or prepared from March 15, 2025 to May 30, 2025.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period,

[3] Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw.

we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the

operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[4]

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

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[4] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan zinke-interior-department-helicopters-wildfires-757857.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

DEMOCRACY FORWARD

July 25, 2025

VIA Electronic Delivery

Department of Justice
FOIA/PA Mail Referral Unit
Room 115
LOC Building
Washington, DC 20530-0001
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Department of Justice ("DOJ") produce the following within twenty (20) business days:

1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) of (a) the DOJ officials below regarding (b) the Jeffery Epstein matter, including records reflecting correspondence between Trump and Epstein.[1]

[1] Attorney General Pamela Bondi, Office of Public Affairs, Letter from Attorney General Bondi to FBI Director Patel, Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files; Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw; Alex Isenstadt, *Exclusive: DOJ, FBI conclude Epstein Had No "Client List," Died By Suicide*, Axios (July 6, 2025), https://www.axios.com/2025/07/07/jeffrey-epstein-suicide-client-list-trump-administration; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files, Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (July 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common; Michelle Stoddart, Alexandra Hutzler, and Lablee Ibssa, *Bondi Says She'll Try to Unseal Epstein Grant Jury Records*, ABC

DOJ Officials:

I. Attorney General Pam Bondi
II. Deputy Attorney General Todd Blanche
III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
IV. Chief of Staff Chad Mizelle
V. Anyone serving as Advisor or Senior Advisor to the Attorney General
VI. Anyone serving as Chief of Staff to the Deputy Attorney General
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General

2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the DOJ officials included in Item 1 containing any of the key terms listed below.[2]

Key Terms:

I. "Client List"
II. Epstein
III. "Flight Logs"
IV. "Ghislaine Maxwell"
V. Whistleblower

The timeframe for the above search should be January 20, 2025 until the date of the search.

Please note that Democracy Forward Foundation does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or

News (July 17, 2025), https://abcnews.go.com/Politics/trump-facing-maga-uproar-epstein-files-shift-blame/story?id=123833646.

[2] Attorney General Pamela Bondi, Office of Public Affairs, Letter from Attorney General Bondi to FBI Director Patel, Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files; Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw; Alex Isenstadt, *Exclusive: DOJ, FBI conclude Epstein Had No "Client List," Died By Suicide*, Axios (July 6, 2025), https://www.axios.com/2025/07/07/jeffrey-epstein-suicide-client-list-trump-administration; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files, Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (July 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common; Michelle Stoddart, Alexandra Hutzler, and Lablee Ibssa, *Bondi Says She'll Try to Unseal Epstein Grant Jury Records*, ABC News (July 17, 2025), https://abcnews.go.com/Politics/trump-facing-maga-uproar-epstein-files-shift-blame/story?id=123833646.

forwarding such emails are responsive to this request. For example, if a specific individual received a mass-distribution news clip email containing the term "Epstein" that initial email would not be responsive to this request. However, if that specific individual forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the

operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[3]

[3] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

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tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan zinke-interior-department-helicopters-wildfires-757857.

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

DEMOCRACY FORWARD

July 25, 2025

VIA Electronic Delivery

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

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Democracy Forward Foundation ("DFF") requests that the Department of Justice ("DOJ") produce the following within twenty (20) business days:

1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) of the FBI officials below regarding (b) the Jeffery Epstein matter, including records reflecting correspondence between Trump and Epstein.[1]

[1] Attorney General Pamela Bondi, *Letter from Attorney General Bondi to FBI Director Patel,* Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now; Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw; Alex Isenstadt, *Exclusive: DOJ, FBI conclude Epstein Had No "Client List," Died By Suicide*, Axios (July 6, 2025), https://www.axios.com/2025/07/07/jeffrey-epstein-suicide-client-list-trump-administration; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files, Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (July 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common; Michelle Stoddart, Alexandra Hutzler, and Lablee Ibssa, *Bondi Says She'll Try to Unseal Epstein Grant Jury Records*, ABC News (July 17, 2025), https://abcnews.go.com/Politics/trump-facing-maga-uproar-epstein-files-shift-blame/story.

FBI Officials:

I. Director Kash Patel
II. Deputy Director Dan Bongino
III. Associate Deputy Director J. William Rivers
IV. Anyone serving as Chief of Staff to the Director
V. Anyone serving as Advisor or Senior Advisor to the Director
VI. Anyone serving as Chief of Staff to the Deputy Director
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Director

2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the FBI officials included in Item 1 containing any of the key terms listed below.

Key Terms:

I. "Client List"
II. Epstein
III. "Flight Logs"
IV. "Ghislaine Maxwell"
V. Whistleblower

The timeframe for the above search should be January 20, 2025 until the date of the search.

Please note that Democracy Forward Foundation does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if a specific individual received a mass-distribution news clip email containing the term "Epstein" that initial email would not be responsive to this request. However, if that specific individual forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request

that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843

F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[2]

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[2] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

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https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan zinke-interior-department-helicopters-wildfires-757857.

DEMOCRACY FORWARD

July 25, 2025

VIA Electronic Delivery

Department of Justice
FOIA/PA Mail Referral Unit
Room 115
LOC Building
Washington, DC 20530-0001
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Department of Justice ("DOJ") produce the following within twenty (20) business days:

1. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) between or among (a) any of the DOJ officials below and (b) any of the FBI officials below, regarding the Jeffery Epstein matter, including records reflecting correspondence between Trump and Epstein.[1]

[1]Attorney General Pamela Bondi, Office of Public Affairs, Letter from Attorney General Bondi to FBI Director Patel, Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now; Marc Caputo, *Scoop: FBI's Dan Bongino Clashes with AG Bondi Over Handling of Epstein Files*, Axios (July 11, 2025), https://www.axios.com/2025/07/11/epstein-files-dan-bongino-pam-bondi-trump; Alex Isenstadt, *Exclusive: DOJ, FBI conclude Epstein Had No "Client List," Died By Suicide*, Axios (July 6, 2025), https://www.axios.com/2025/07/07/jeffrey-epstein-suicide-client-list-trump-administration; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files, Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (July 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common; Michelle Stoddart, Alexandra Hutzler, and Lablee Ibssa, *Bondi Says She'll Try to Unseal Epstein Grant Jury Records*, ABC News (July 17, 2025), https://abcnews.go.com/Politics/trump-facing-maga-uproar-epstein-files-shift-blame/story.

DOJ Officials:

I. Attorney General Pam Bondi
II. Deputy Attorney General Todd Blanche
III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
IV. Chief of Staff Chad Mizelle
V. Anyone serving as Advisor or Senior Advisor to the Attorney General
VI. Anyone serving as Chief of Staff to the Deputy Attorney General
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General

FBI Officials:

I. Director Kash Patel
II. Deputy Director Dan Bongino
III. Associate Deputy Director J. William Rivers
IV. Anyone serving as Chief of Staff to the Director
V. Anyone serving as Advisor or Senior Advisor to the Director

2. All records reflecting communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on messaging platforms, including Slack and Microsoft Teams, and summaries of oral communications) between (a) any of the DOJ or FBI officials below and (b) White House Press Secretary Karoline Leavitt, including any @who.eop.gov email address associated with her, regarding the Jeffrey Epstein matter, including records reflecting correspondence between Trump and Epstein.[2]

DOJ/FBI Officials:

I. Attorney General Pam Bondi
II. Deputy Attorney General Todd Blanche

[2]Attorney General Pamela Bondi, Office of Public Affairs, Letter from Attorney General Bondi to FBI Director Patel, Department of Justice (Feb. 27, 2025), https://www.justice.gov/ag/media/1391331/dl?inline; Haley Chi-Sing, *Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*, Fox News (Feb. 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now; Marc Caputo, *Scoop: FBI's Dan Bongino Clashes with AG Bondi Over Handling of Epstein Files*, Axios (July 11, 2025), https://www.axios.com/2025/07/11/epstein-files-dan-bongino-pam-bondi-trump; Alex Isenstadt, *Exclusive: DOJ, FBI conclude Epstein Had No "Client List," Died By Suicide*, Axios (July 6, 2025), https://www.axios.com/2025/07/07/jeffrey-epstein-suicide-client-list-trump-administration; Office of Public Affairs, *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files*, Department of Justice (Feb. 27, 2025), https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files, Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (July 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common; Michelle Stoddart, Alexandra Hutzler, and Lablee Ibssa, *Bondi Says She'll Try to Unseal Epstein Grant Jury Records*, ABC News (July 17, 2025), https://abcnews.go.com/Politics/trump-facing-maga-uproar-epstein-files-shift-blame/story.

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VI. Anyone serving as Chief of Staff to the Deputy Attorney General
VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General
VI. Director Kash Patel
VII. Deputy Director Dan Bongino
VIII. Associate Deputy Director J. William Rivers
IX. Anyone serving as Chief of Staff to the Director
X. Anyone serving as Advisor or Senior Advisor to the Director

The timeframe for the above search should be January 20, 2025 until the date of the search.

Please note that Democracy Forward Foundation does not seek the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if a specific individual received a mass-distribution news clip email containing the term "Epstein Files" that initial email would not be responsive to this request. However, if that specific individual forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to

receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein

matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[3]

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request

[3] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan zinke-interior-department-helicopters-wildfires-757857.

and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

DEMOCRACY FORWARD

July 25, 2025

VIA Electronic Delivery

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602
Via online portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the Federal Bureau of Investigation produce the following within twenty (20) business days:

1. All directives, guidance, and instructions provided from (a) agency political appointees or other leadership to (b) agency personnel designated to the Information Management Division to assist with the Epstein-related records review between March 14, 2025 and March 30, 2025, including "flagging" any reference to President Trump in the records.[1]

2. Records reflecting all staff assigned to review Epstein-related records, such as a list of agent names; calendar entries of participants, or email including email addresses reflecting those staff.

3. All records reflecting all mentions of President Trump within the Epstein-related records review that took place between March 14, 2025 and March 30, 2025.[2]

[1] Senator Dick Durbin, *Letter to AG Bondi re Epstein*, The United States Senate Committee on the Judiciary (July 18, 2025), https://www.judiciary.senate.gov/imo/media/doc/2025-07-18%20RJD%20Letter%20to%20AG%20Bondi%20re%20Epstein.pdf.

[2] Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw.

The timeframe for the above search should be March 14, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a

"demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[3]

[3] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation

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immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan zinke-interior-department-helicopters-wildfires-757857.

P.O. Box 34553
Washington, D.C. 20043

Exhibit 2

DEMOCRACY FORWARD

July 28, 2025

VIA Electronic Delivery

Department of Justice
Criminal Division
Christina Butler, Chief, FOIA/PA Unit
950 Constitution Ave, NW
Washington, DC 20530-0001
crm.foia@usdoj.gov

Department of Justice
Executive Office for United States Attorneys
Arla Witte-Simpson, FOIA Public Liaison
175 N Street, NE, Suite 5.400
Washington, DC 20530
Via online portal

Department of Justice
FOIA/PA Mail Referral Unit
Room 115
LOC Building
Washington, DC 20530-0001
Via online portal

Department of Justice
Office of Information Policy
Andrew Fiorillo, Acting Chief
441 G St, NW, 6th Floor
Washington, DC 20530
Via online portal

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602
Via online portal

Re: Expedited Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that your agency produce the following within twenty (20) business days:

All records reflecting all correspondence between Donald J. Trump and Jeffrey Epstein.

Public reporting makes clear that there are case files related to the Jeffrey Epstein and

Ghislaine Maxwell criminal matters, and these are appropriate locations to search for responsive records. Additionally, reporting indicates that Epstein case records were recently reviewed, including in March of this year, for mentions of President Trump.[1]

The timeframe for the above search should be for records created from January 1, 1990 until the date of the search. However, despite this long time frame, the responsive records have likely been reviewed since January 20, 2025.

Request for Expedited Processing

Democracy Forward Foundation ("DFF") requests the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI") expedite the processing of this FOIA request.

DFF's requests merit expedited processing because: (1) the requests concern a "matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence," *see* 28 C.F.R. § 16.5(e)(iv); and (2) there is an urgency to inform the public concerning actual or alleged Federal Government activity, *see* 5 U.S.C. § 552(a)(6)(E)(v)(II).

I. DFF's requests concern a matter attracting exceptional media interest in which there exist possible government integrity questions that affect public confidence.

To qualify for expediting processing under 28 C.F.R. § 16.5(e)(iv), the Department of Justice has interpreted subsection (iv) to require that "the same matter that draws widespread and exceptional media interest must be the matter in which there exists possible questions about the government's integrity that affect public confidence." *Am. Oversight v. U.S. Dep't of Just.*, 292 F. Supp. 3d 501, 506 (D.D.C. 2018). DFF's instant FOIA requests satisfy both criteria.

A. DFF's requests concern a matter attracting widespread and exceptional media interest.

The focus of DFF's FOIA requests–the Government's handling of the Jefferey Epstein matter–has garnered immense attention from the American public, congress, and the press. In particular, there has been significant media coverage and public interest surrounding the

[1] Nnamdi Egwuonwu, *FBI Personnel Were Told to Flag Epstein Files Mentioning Trump, Senate Democrat Says*, NBC News (Jul. 18, 2025), https://www.nbcnews.com/politics/congress/fbi-personnel-jeffrey-epstein-files-mentioning-trump-dick-durbin-says; Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (July 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=e2tw.

information contained within Epstein matter case files and whether that information should be disclosed to the public.

In 2024, the media widely reported President Trump's campaign trail comments that he would release files relating to the Jeffery Epstein matter.[2] Following the Inauguration, media reported Trump Administration officials' statements that they would work to release additional information from the files.[3] For example, during an interview with Fox News's 'America Reports,' Attorney General Bondi stated in regards to Epstein's client list: "It's sitting on my desk right now to review." Attorney General Bondi subsequently released hundreds of pages of documents related to the investigation in what the Department referred to as a "first phase." However, much of what was released was already publicly available.[4]

Media further reported that, following public pressure to release additional information, Attorney General Bondi sent a letter to FBI Director Patel saying she was told by "a source" that thousands of documents that may be relevant were potentially withheld and that the FBI must hand over "the full and complete Epstein files." No additional records were released following the demand letter.[5]

Accordingly, the media widely documented the reported scouring of Epstein records by hundreds of DOJ and FBI employees, who reportedly worked around the clock to find relevant materials, including any mentions of the President.[6] As a result of that search, earlier this month, the DOJ represented that Epstein did not maintain a "client list" and that no additional files would be made public, other than an edited video relating to Epstein's death.[7] Responding to public

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[2] *See, e.g.*, Lex Fridman, *Transcript for Donald Trump Interview*, (Sept. 3, 2024), https://lexfridman.com/donald-trump-transcript#chapter16_jeffrey_epstein; MSNBC, *Trump Hedges on Declassifying Epstein Files*, (Jun. 6, 2024), https://youtube.com/shorts.

[3] Piers Morgan, *"DISTURBING" Alina Habba on Epstein Files & Tate Brothers + "Putin Lickspittle" George Galloway*, Piers Morgan Uncensored (Feb. 27, 2025), https://youtu.be/D3JzvP87Zu8?feature=shared; Adam Shaw, *Kash Patel Vows to 'Do Everything' To Help GOP Senator Expose Epstein Files*, Fox News (Jan 30, 2025), https://www.foxnews.com/politics/kash-patel-vows-do-everything-help-gop-senator-expose-epstein-files.

[4] Kerry Breen, *Right-Wing Influencers Get Binders Labeled "The Epstein Files," But Downplay Revelations*, CBS News (Feb 27. 2025), https://www.cbsnews.com/news/right-wing-influencers-get-binders-labeled-the-epstein-files-but-downplay-revelations/; Jeremy Roebuck, *Trump DOJ Releases Some Epstein Files, Says There's Little New Info*, The Washington Post (Feb. 27, 2025), https://www.washingtonpost.com/national-security/2025/02/27/jeffrey-epstein-files-doj-pam-bondi/.

[5] *See, e.g.*, Roebuck, Id.

[6] *See, e.g.*, Nnamdi Egwuonwu, *FBI Personnel Were Told to Flag Epstein Files Mentioning Trump, Senate Democrat Says*, NBC News (Jul. 18, 2025), https://www.nbcnews.com/politics/congress/fbi-personnel-jeffrey-epstein-files-mentioning-trump-dick-durbin-says; Adam Goldman and Alan Feuer, *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, The New York Times (Jul. 24, 2025), https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html.

[7] Cheyanne Daniels, *Outraged Trump Supporters Not Placated by DOJ's Actions on Epstein,* Politico (Jul. 22, 2025), https://www.politico.com/news/2025/07/22/trump-maga-supporters-epstein-doj; Dhruv Mehrotra, *The FBI's Jeffrey Epstein Prison Video Had Nearly 3 Minutes Cut Out*, WIRED (Jul. 15, 2025),

backlash from this representation, media reported President Trump's subsequent directive that the Attorney General should release any 'credible' information on the Epstein matter.[8] Attorney General Bondi then requested that all pertinent Grand Jury testimony be released, but a judge denied this request.[9]

Finally, media has widely reported that Deputy Attorney General Blanche recently met with Ghislaine Maxwell to discuss information potentially relevant to this matter, sparking speculation about a potential pardon for Maxwell from President Trump.[10] Around the same time, *The Wall Street Journal* reported: first, that President Trump had sent a "bawdy" letter to Epstein for his 50th birthday; and second, that back in May, the Department told President Trump that his name is among many in the Epstein files.[11]

Though certainly not an exhaustive recitation of all reporting on the Government's handling of the Epstein matter, the above sampling of media reports clearly demonstrates that this issue has attracted widespread and exceptional media interest, highlighting the pressing need for expedited processing of this request.

A. There exist in these media reports questions about the government's integrity that affect public confidence.

Moreover, the widespread media reporting on the Government's handling of the Epstein matter implicates numerous questions about the government's integrity, including whether:

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https://www.wired.com/story/the-fbis-jeffrey-epstein-prison-video-had-nearly-3-minutes-cut-out/; Eric Tucker and Alanna Durkin Richer, *Epstein 'Client List' Doesn't Exist, Justice Department Says, Walking Back Theory Bondi Had Promoted*, Associated Press (Jul. 7, 2025), https://apnews.com/article/jeffrey-epstein-justice-department-pam-bondi.

[8] Nadine Yousif, *Trump Says US Attorney General Should Release Any 'Credible' Information on Epstein*, BBC (Jul. 16, 2025), https://www.bbc.com/news/articles.

[9] *See* Jeremy Roebuck, *Judge in Florida Denies Justice Dept. Request to Release Epstein Transcripts*, The Washington Post (Jul. 23, 2025), https://www.washingtonpost.com/national-security/2025/07/23/epstein-transcripts-florida-judge-justice-department/.

[10] *See, e.g.*, Aaron Katersky, Katherine Faulders, Brandon Baur, and Jon Haworth, *Ghislaine Maxwell Received Limited Immunity During Meetings with Deputy Attorney General: Sources*, ABC News (Jul. 25, 2025), https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story.

[11] *See, e.g.*, Sadie Gurman, Annie Linskey, Josh Dawsey, and Alex Leary, *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, The Wall Street Journal (Jul. 23, 2025), https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files; Khadeeja Safdar and Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, The Wall Street Journal (Jul. 17, 2025), https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common.

1) Attorney General Bondi misled the American people in representing that the "client list" was on her desk and ready for review or in representing that additional information related to the Epstein matter would be released?[12]

2) The Trump Administration has reversed course on the decision to disclose the Epstein matter files out of a desire to cover-up the content within for political or personal reasons rather than out of a desire to protect traditional law enforcement interests?[13] This concern includes whether the administration reversed course to prevent the release of files that relate to President Trump.

3) The Trump Administration's engagement in this matter presents serious conflicts of interest? This includes questions about whether there are conflicts raised through Deputy Attorney General Todd Blanche's questioning of an Epstein co-conspirator after serving as President Trump's personal lawyer and President Trump's contemporaneous refusal to rule out pardoning that co-conspirator.[14]

The government's actions have plainly sparked concern in the public's confidence in the government's handling of this matter, and the questions above concerning the government's integrity have been integral to the significant volume of media reports mentioned above. Polling data shows that the handling of this matter will affect public confidence as a recent poll from

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[12] Haley Chi-Sing, "*Bondi says Epstein client list 'sitting on my desk right now,' and is reviewing JFK, MLK files*," FOX News (February 21, 2025), https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files; Greta Cross, "*AG Pam Bondi plans to release flight logs, names related to Jeffrey Epstein on Thursday*," USA Today (February 27, 2025), https://www.usatoday.com/story/news/politics/2025/02/27/jeffrey-epstein-flight-logs-names-pam-bondi/80690426007/; Bart Jansen and John Kennedy, "*Bondi pledged 'transparency' on Epstein files, but grapples with how much*," USA Today (July 27, 2025), https://www.usatoday.com/story/news/politics/2025/07/27/pam-bondi-jeffrey-epstein-release-criminal-file/85338256007/; Eric Tucker and Alanna Durkin Richer, "*Mystery surrounds the Jeffrey Epstein files after Bondi claims 'tens of thousands' of videos*," Associated Press (July 1, 2025), https://apnews.com/article/justice-department-jeffrey-epstein-pam-bondi-trump-fa39193d5b5ff91970428bf077a5ce44

[13] Aaron Blake, "*Timeline suggests Trump team changed its tune on Epstein files after Trump was told he was in them*," CNN (July 24, 2025), https://www.cnn.com/2025/07/24/politics/trump-epstein-files-pivot-timeline; Chris Cameron, "*Trump Really Wants to Stop Talking About Epstein: A Timeline*," The New York Times (July 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-distraction-timeline.html; Hady Mawajdeh and Sean Rameswaram, "*Why doesn't Donald Trump want to release the Epstein Files?*," Vox (July 17, 2025), https://www.vox.com/today-explained-podcast/419905/jeffrey-epstein-files-client-list-donald-trump-pam-bondi; Adam Goldman and Alan Feuer, *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, The New York Times (Jul. 24, 2025), https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html; Domenico Montanaro, "*How and why Trump has struggled in dealing with the Epstein files*," NPR (July 25, 2025), https://www.npr.org/2025/07/25/nx-s1-5479144/trump-epstein-files-politics-maga

[14] NPR, "*DOJ faces credibility questions as it investigates Jeffrey Epstein*," (July 25, 2025), https://www.whro.org/2025-07-25/doj-faces-credibility-questions-as-it-investigates-jeffrey-epstein; Philip Rotner, "*Why the Huge Conflicts of Interest Among Trump's Epstein Team Matter*," The Bulwark (July 25, 2025), https://www.thebulwark.com/p/why-the-huge-conflicts-of-interest-trump-epstein-lawyers-bondi-blanche-ghislaine-maxwell; Glenn Thrush and Valerie Crowder, "*After Ghislaine Maxwell Interview, Concerns Mount Over Possibility of Pardon*," The New York Times (July 25, 2025), https://www.nytimes.com/2025/07/25/us/politics/ghislaine-maxwell-trump-pardon.html

CBS-News and YouGov found that 58 percent of respondents say they're following news about the case "somewhat" or "very closely," and additional polling out of Quinnipiac University's National Poll finds that 63 percent of voters disapprove of the Trump administration's handling of the Epstein files matter.[15] This includes some of the Administration's loyal and vocal supporters, including pundit Tucker Carlson who has stated "As someone who voted for the president, campaigned for the president a lot — I'm not attacking the president, but I think even people who are fully on board with the bulk of the MAGA agenda are like, 'This is too much, actually.'"[16] Members of Congress from both parties have also raised concerns about the government's integrity relating to this matter.[17] In a significant move, a House subcommittee voted and approved subpoenaing the administration relating to the matter.[18] All of the above highlights that the administration's failure to keep its promise has raised considerable concerns about government integrity and that further scrutiny is expected.[19]

I. There is an urgency to inform the public concerning actual or alleged Federal Government activity.

As an initial point, DFF–as a not-for-profit organization that works to promote transparency and accountability in government–is primarily engaged in disseminating information to the public.

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[15] Ruth Igielnik and Kellen Browning, *Republicans Are Breaking With Trump Over Epstein Files, Polls Show*, The New York Times (Jul. 23, 2025), https://www.nytimes.com/2025/07/23/us/politics/epstein-trump-republicans; Quinnipiac University Poll, *63% Of Voters Disapprove Of The Trump Administration's Handling Of The Jeffrey Epstein Files, Quinnipiac University National Poll Finds; Nearly Half Of Voters Would Consider Joining A Third Party, Just Not One Created By Elon Musk*, (Jul. 16, 2025), https://poll.qu.edu/poll-release?; Anthony Salvanto, Jennifer De Pinto, and Kabir Khanna, *CBS News Poll Finds Support for Trump's Deportation Program Falls; Americans Call for More Focus on Prices*, CBS News (Jul. 20, 2025), https://www.cbsnews.com/news/cbs-news-poll-trump-deportation-program-prices/.

[16] Amber Phillips, *What to Know About the Metastasizing Jeffrey Epstein controversy*, The Washington Post (Jul. 28, 2025), https://www.washingtonpost.com/politics/2025/07/28/epstein-files-trump-what-to-know/.

[17] David Morgan, *Epstein furor undermines public trust, Republican election hopes, two US lawmakers say*, Reuters (July 27, 2025), https://www.reuters.com/world/us/epstein-furor-undermines-public-trust-republican-election-hopes-two-us-lawmakers-2025-07-28/; Sarah Ferris, Annie Grayer, Lauren Fox, and Manu Raju, *The Epstein Files Are Roiling the House GOP, And There's No End In Sight*, CNN Politics (Jul. 24, 2025), https://www.cnn.com/2025/07/24/politics/house-republicans-epstein-trump; Allison Pecorin, Ivan Pereira, and Isabella Murray, *GOP Sen. Thom Tillis Says Epstein Files Could Impact Midterm Prospects*, ABC News (Jul. 23, 2025), https://abcnews.go.com/Politics/tillis-continues-push-trump-administration-release-epstein-files/story

[18] Lauren Peller, John Parkinson, and Jay O'Brien, *Justice Department Faces Subpoena Over Epstein Files by House Oversight Committee*, ABC News (Jul. 23, 2025), https://abcnews.go.com/Politics/house-oversight-committee-issues-subpoena-ghislaine-maxwell/story.

[19] Chris Cameron, *Trump Really Wants to Stop Talking About Epstein: A Timeline*, The New York Times, Anna Commander, *Republican Targeted by Trump Says Epstein Issue 'Not Going To Go Away*, Newsweek (Jul. 23, 2025), https://www.newsweek.com/republican-targeted-trump-says-epstein-issue-not-going-away-2103191; Elizabeth Elkind, *'Not Going Away': Inside the Epstein Drama That's Thrown House GOP Into Chaos*; Fox News (Jul. 22, 2025), https://www.foxnews.com/politics/not-going-away-inside-epstein-drama-thats-thrown-house-gop-chaos; Erin Kelly, *Rep. Thomas Massie: Push for Epstein Records 'Not Going Away,'* Spectrum News 1 (Jul. 23, 2025), https://spectrumnews1.com/ky/louisville/news/2025/07/22/massie-epstein-records; Sacha Pfeiffer and Majd Al-Waheidi, *As Lawmakers Head Into August Recess, The Epstein Controversy Keeps Bubbling*, National Public Radio (Jul. 23, 2025), https://www.npr.org/2025/07/23/g-s1-78982/house-democrats-trump-officials-epstein;

DFF is an organization primarily engaged in "disseminating information to the public,"[20] as evidenced by the previous use of public records obtained by DFF in numerous news reports.[21] DFF makes records it receives via FOIA requests publicly available and disseminates information about those records requests through its own analysis and products as well as through media outlets.

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[20] 5 U.S.C. § 552 (6)(E)(v)(II) ("Compelling need" for the purpose of expedited processing mean "with respect to a request made by a person primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged Federal Government activity.").

[21] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, Buzzfeed News (July 25, 2018), https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, Buzzfeed News (Mar. 22, 2018), https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), *available at* https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857.

There is an urgency to inform the public about the Administration's handling of the Epstein matter pursuant to 5 U.S.C. § 552(a)(6)(E)(v)(II), as there is both intense public interest surrounding the Administration's actions, and there are pending governmental decisions that could occur in short order. This creates a current exigency for the public to receive the information requested in advance of those actions.

First, President Trump, as noted above, has repeatedly refused to rule out granting clemency to Epstein's co-conspirator Ghislaine Maxwell.[22] This gives rise to serious concerns that clemency, which cannot be revoked, would remove her reasons for sharing information about prominent individuals' involvement in sex trafficking and the government's consequent handling of the prosecution of those crimes–and its decision not to release information about those activities–permanently.

Second, the Deputy Attorney General has quickly begun discussions with Ms. Maxwell, including through an offer of limited immunity.[23] DOJ may, consequently, take action with respect to Ms. Maxwell's case in a manner that cannot be altered later. This could affect Ms. Maxwell's willingness to publicly disclose information about the government's handling of the Epstein matter and its decisions not to disclose information about the Epstein matter permanently.

Given this current exigency, it is important for the public to access information about these matters while they can still petition their government leaders and advocate for a different course of action. If action is taken to alter Ms. Maxwell's status before the release of the requested records, information that is critical to the public interest about the government's handling of the Epstein matter may never come to light.

In sum, the release of federal records related to this historic matter are of critical importance. The American public desires to know more about the Administration's actions and if it deliberately attempted to mislead the American public. Given the compelling need for disclosing such information, Democracy Forward Foundation seeks expedited processing of this request.

I certify to the best of my knowledge and belief that the above is accurate and expedited processing is warranted in this matter.

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[22] *See, e.g.*, Brian Bennett, *Trump: Ghislaine Maxwell Pardon 'Inappropriate' to Talk About 'Right Now,'* TIME (July 28, 2025), https://time.com/7305903/donald-trump-ghislane-maxwell-pardon/?utm_source=chatgpt.com; Sarah Ewall-Wice, *Ghislaine Handed DOJ 100 Names in Shameless Pardon Quid Pro Quo*, Daily Beast (July 26, 2025), https://www.thedailybeast.com/ghislaine-handed-doj-100-names-in-brazen-pardon-quid-pro-quo/?utm_source=chatgpt.com.

[23] *Supra* note 9.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, DFF requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates

records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, *see id*., or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

The requested waiver is in the public interest because providing the copy of the information sought primarily benefits the general public. Democracy Forward Foundation has a demonstrated ability to disseminate information of public interest requested through freedom of information statutes, and based upon responses to this request may assist in publicizing records received to contribute to the public's understanding of DOJ's actions relating to the release of the Epstein matter materials. DFF intends to publicize records DFF receives to contribute significantly to the public's understanding of how this Administration has backtracked on efforts to be transparent.

To this latter point, DFF has a demonstrated ability to disseminate information of public interest requested through FOIA. When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.[24]

[24] *See*, *e.g.*, Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on policy; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, Buzzfeed News (Feb. 28, 2019), https://www.buzzfeednews.com/article/hamedaleaziz/zero tolerance-policy-guidance-dhs-family-separation; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california immigration/; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11; Rebecca Klein, *Lawsuit*

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to $50. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman
Skye Perryman
President and CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

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