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VIA Electronic Delivery

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Federal Bureau of Investigation
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200 Constitution Drive
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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 Jeffrey 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

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:

<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

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.

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.

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.

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-ghislaine-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

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