



August 6, 2025

Andrew Fiorillo,  
Acting Chief, Initial Request Staff  
U.S. Department of Justice  
Office of the Attorney General  
6th Floor  
441 G St, NW  
Washington, DC 20530-0001

Re: Freedom of Information Act Request

Dear FOIA Officer,

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

Specifically, DDF requests all records from July 1, 2025, to when this request is processed, of:

1. Records of all communications, including, but not limited to, letters, faxes, emails, voicemails, direct messages, or any form of electronic message, regardless of whether maintained on an official device or account or a personal device or account, concerning the transfer of Ghislaine Maxwell to Federal Prison Camp (FPC) Bryan, or her redesignation of the place of imprisonment to FPC Bryan. This includes any communication to or from, or determinations made by, Attorney General Pam Bondi, Deputy Attorney General Todd Blanche, Federal Bureau of Prisons Director William K. Marshall III, or any employee or contractor of the Department of Justice, including the Bureau of Prisons and the Bureau's Designation Sentence Computation Center, concerning Ms. Maxwell's transfer or redesignation of place of imprisonment.
2. Records of all communications, including, but not limited to, letters, faxes, emails, voicemails, direct messages, or any form of electronic message, regardless of whether maintained on an official device or account or a personal device or account, including copies of any determination, and any supporting documentation forming the basis of any determination, made by the Department of Justice, including the Bureau of Prisons, concerning waiver of the Bureau of Prisons policy that Ghislaine Maxwell, as a convicted sex offender, be housed in at least a Low security level institution.

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

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

### **Fee Waiver Request**

Pursuant to 5 U.S.C. 552(a)(4)(a) and 28 C.F.R. 16.10(k), DDF requests a waiver of fees associated with processing this request. Department regulations provide for a waiver of fees when it involves the “disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.”<sup>4</sup> Courts have found that a fee waiver is appropriate when the disclosure will “(1) shed light on ‘the operations or activities of the government’; (2) be ‘likely to contribute significantly to public understanding’ of those operations or activities; and (3) not be ‘primarily in the commercial interest of the requester.’” DDF’s request meets all elements.<sup>5</sup>

First, the disclosure will shed light on the “operations” and “activities” of the Department of Justice. Specifically, release of these records will provide needed transparency concerning how and why the Department decided to transfer Ghislaine Maxwell to FPC Bryan. Ghislaine Maxwell was a close confidant to Jeffery Epstein and is currently serving a 20-year sentence for sex trafficking.<sup>6</sup> She is likely one of the few people who have information that could be used to

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<sup>1</sup> 484 F.2d 820 (D.C. Cir. 1973).

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

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

<sup>4</sup> 28 C.F.R. 16.10(k)(1).

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

<sup>6</sup> Department of Justice, *Press Release: Ghislaine Maxwell Sentenced To 20 Years In Prison For Conspiring With Jeffrey Epstein To Sexually Abuse Minors* (June 28, 2022), <https://www.justice.gov/usao-sdny/pr/ghislaine-maxwell-sentenced-20-years-prison-conspiring-jeffrey-epstein-sexually-abuse>.

pinpoint the clients and close associates of Jeffery Epstein, some of whom may have engaged in, facilitated, or been aware of, illegal sexual activity with underage girls.

In the run up to the 2024 election, President Trump announced that he would release documents related to Epstein's investigation and his "client list".<sup>7</sup> Following President Trump's inauguration, the Department reportedly undertook a major review of the Epstein files, with the apparent goal of releasing information about Epstein's associates. However, and despite AG Bondi's assertion that she had the Epstein list "on [her] desk," the Department issued a memo stating that their, "systematic review" of the Epstein files "revealed no incriminating 'client list.'"<sup>8</sup> At the same time, it was recently reported Attorney General Bondi assigned nearly 1,000 FBI officials to comb through tens of thousands of pages of documents related to Epstein to flag mentions of the President<sup>9</sup> and personally briefed the President on instances of his name appearing in documents related to Jeffrey Epstein in May.<sup>10</sup> No further documents have been made public.

Against this backdrop, Deputy Attorney General Blanche—one of President Trump's former personal attorneys—met with Ms. Maxwell and her attorney for two days in July behind closed doors where he reportedly asked her a series of questions concerning individuals who may have been connected to Epstein's crimes.<sup>11</sup> Reports now suggest that she may have received qualified immunity<sup>12</sup>, and has been transferred from a Low security institution to a minimum-security Federal Prison Camp.<sup>13</sup>

This arrangement is abnormal for several reasons. First, Ms. Maxwell is currently serving a 20-year sentence for sex trafficking. Sex offenders are required by the Bureau of Prisons' Program Statement 5100.008 to be housed in a Low level security institution unless a waiver is provided.<sup>14</sup> It is unclear why Maxwell would have been eligible to transfer to a minimum-security prison camp, given the horrendous activities she was convicted of

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<sup>7</sup> Tess Owen, *How the Trump administration's handling of the Epstein files became a vehicle for QAnon*, The Guardian (Jul. 15, 2025), <https://www.theguardian.com/us-news/2025/jul/15/trump-epstein-files-maga>

<sup>8</sup> US Department of Justice, Memo on Epstein Investigation, Jul. 2025, <https://www.justice.gov/opa/media/1407001/dl?inline>.

<sup>9</sup> Alexander Bolton, *Durbin: FBI Agents were Told to 'Flag' Epstein Records that Mention Trump*, The Hill (July 18, 2025), <https://thehill.com/homenews/senate/5409002-trump-epstein-files-ag-bondi-patel-bongino-fbi-agents-durbin-wall-street-journal/>

<sup>10</sup> Sadie Gurman, et al., *Justice Department Told Trump in May that His Name is Among Many in the Epstein Files*, Wall Street J. (July 23, 2025), [https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=hp\\_trendingnow\\_article\\_pos1](https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038?mod=hp_trendingnow_article_pos1)

<sup>11</sup> Aaron Katersky, et al., *Ghislaine Maxwell Received Limited Immunity During Meetings With Deputy Attorney General: Sources*, ABC News (July 25, 2025), <https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story?id=124064062>.

<sup>12</sup> Aaron Katersky, et al., *Ghislaine Maxwell Received Limited Immunity During Meetings With Deputy Attorney General: Sources*, ABC News (July 25, 2025), <https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story?id=124064062>.

<sup>13</sup> Kaitlan Collins, et al., *Ghislaine Maxwell Moved to Federal Prison Camp in Texas*, CNN (Aug. 1, 2025), <https://www.cnn.com/2025/08/01/politics/ghislaine-maxwell-federal-prison-texas>.

<sup>14</sup> Department of Justice, Bureau of Prisons, Program Statement § 5100.008, Ch. 5, pp. 8 (2025), <https://www.bop.gov/PublicInfo/execute/policysearch?todo=query&series=5000#>

perpetrating. Second, Maxwell is likely one of the only people capable of substantiating information about Epstein's clients and associates. Absent releasing the Department's investigative files, she represents one of the only ways the public has to obtain information concerning whether the President (or any other government official) knew about, or was involved in, Epstein's activities. Third, the arrangement is particularly ripe for coercion and abuse of authority. Maxwell is in prison. She, as any person, would be motivated to take actions that would return her liberty (or at least make her time in prison less unpleasant). Her attorney has expressly stated that she is "eager to receive clemency"—something only the President could do.<sup>15</sup>

The public deserves to know why the Department decided to transfer Maxwell to minimal-security housing and why it decided it was appropriate to waive Bureau of Prisons' policy to do so. This decision is yet another irregularity in a series<sup>16</sup> of irregularities<sup>17</sup> surrounding the investigation and disclosure of information concerning Jeffery Epstein's abuse of young girls. Disclosure of these documents is therefore necessary to provide a full record of what communications occurred, when they occurred, and whether any such communications might have resulted in abnormalities in the Department's treatment of Maxwell, and, by extension, its investigation of Epstein's crimes and the people in his orbit..

Second, disclosure of the information will significantly aid the public's understanding of the decisions the Department undertook when it authorized Maxwell's transfer, and whether any basis for her transfer was inappropriately linked to information she may have provided to the Department. To date, President Trump's failure to release the Epstein files has undermined public confidence in the Department's handling of these records. This is mainly due to the repeated promises he made to his supporters during the campaign that he would declassify the Epstein files and release the "Epstein client list."<sup>18</sup> The Department's bumbling and confused handling of the matter has further undermined public confidence. Its numerous contradictory statements related to the investigation,<sup>19</sup> for instance, have caused immense confusion amongst the public.<sup>20</sup> Yet instead of releasing the files, the Department called on the President's former attorney to meet with the single individual who could potentially identify who might be named in the Epstein files. Release of the documents requested is therefore necessary to aid the public in

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<sup>15</sup> Aaron Katersky, *Ghislaine Maxwell Offers to Testify Before Congress on Jeffrey Epstein if She Is Pardoned*, ABC News (July 29, 2025),

<https://abcnews.go.com/US/ghislaine-maxwell-offers-testify-congress-jeffrey-epstein-pardoned/story?id=124180072>

<sup>16</sup> Ryan Lucas, *Todd Blanche's Past Hangs Over Him as Top DOJ Official on Epstein Case*, NPR (Jul. 29, 2025), <https://www.npr.org/2025/07/29/nx-s1-5484129/todd-blanche-epstein-ghislaine-maxwell-trump>.

<sup>17</sup> Dhruv Mehrotra, *The FBI's Jeffrey Epstein Prison Video Had Nearly 3 Minutes Cut Out*, Wired (July 16, 2025), <https://www.wired.com/story/the-fbis-jeffrey-epstein-prison-video-had-nearly-3-minutes-cut-out/>.

<sup>18</sup> Tess Owen, *How the Trump administration's handling of the Epstein files became a vehicle for QAnon*, The Guardian (Jul. 15, 2025), <https://www.theguardian.com/us-news/2025/jul/15/trump-epstein-files-maga>.

<sup>19</sup> See, e.g., Alexandra Hutzler, *What Trump has said about Jeffrey Epstein over the years, including on 2024 campaign trail*, ABC News (Jul. 16, 2025),

<https://abcnews.go.com/Politics/trump-jeffrey-epstein-years-including-2024-campaign-trail/story?id=123778541>.

<sup>20</sup> See, e.g., Mike Wendling, *Why the Epstein case looms large in MAGA world*, BBC (Jul. 18, 2025)

<https://www.bbc.com/news/articles/cy8ge16d2y3o>; Jason Lange, *Trump faces backlash as 69% believe Epstein details concealed*, Reuters/Ipsos poll finds, Reuters (Jul. 17, 2025),

<https://www.reuters.com/world/us/trump-faces-backlash-69-believe-epstein-details-concealed-reutersipsos-poll-2025-07-17/>.

its understanding of the Department's handling of this situation. It is particularly important that the public understand whether the Department has offered Maxwell, a convicted sex offender who trafficked multiple young girls, concessions as a result of any agreement she made with Deputy Attorney General Blanche—and if such an offer did take place, the public must know why.

Third, the purpose of the disclosures is not “primarily in the commercial interest of” DDF. DDF is a nonprofit organization established under section 501(c)(3) of the Internal Revenue Code. DDF’s core mission is to defend the rule of law, fight corruption, and protect elections using a variety of tools including publication of information concerning ongoing activities of the government. DDF regularly speaks on issues related to government activities through traditional broadcast media, podcasts, and the issuance of op-eds.<sup>21</sup> DDF maintains a dedicated website where it provides information related to its activities, which can be accessed by the public.<sup>22</sup> The purpose of the disclosure is to inform the public on activities of the government.

In addition, DDF requests waiver of fees related to processing this request as representative of the news media pursuant to 5 U.S.C. 552(a)(4)(A)(ii)(II). DDF routinely collects information of “potential interest to a segment of the public” and “uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience.”<sup>23</sup> As noted above, DDF maintains a dedicated webpage for informing the public about activities related to government activity through a variety of media, including press releases, public reports, and op-eds. DDF experts routinely engage with the public and with other members of the new media to publicize important information, including information related to government activities. Pursuant to existing case law, DDF clearly meets the criteria for a fee waiver under section 552(a)(4)(A)(ii)(II).

### **Request for Expedited Processing**

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

DDF has requested expedition of this request because:

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

Department regulations provide for expedited processing of any request involving an “urgency to inform the public about an actual or alleged Federal government activity, if made by a person who primarily engaged in disseminating information.” 5 C.F.R. 16.5(e)(1)(ii). The outrageous

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<sup>21</sup> See e.g., Virginia Canter, et al., *Why we 'Democracy Defenders' are demanding information about DOGE*, MSNBC (Dec. 27, 2024, 3:00AM PT), <https://www.msnbc.com/opinion/msnbc-opinion/group-launched-inquiry-musk-ramaswamys-doge-rcna185248>; see also Norman Eisen, Virginia Canter, and Richard Painter, *A Plane from Qatar? C'Mon, Man!*, New York Times (May 14, 2025), <https://www.nytimes.com/2025/05/14/opinion/trump-plane-qatar-crypto.html>.

<sup>22</sup> See <https://www.democracydefendersfund.org/news-resources>.

<sup>23</sup> *Nat'l Sec. Archive v. Dept. of Def.*, 880 F.2d 1381, 1387 (D.C. Cir. 1989).



nature of the alleged activity engaged in by Epstein and the failure of the Department to release the files, after both the President and his Attorney General promised to do so, has caused his supporters, the media and the general public much outrage and alarm. The failure to release the documents raises questions about whether President Trump's name may appear in the files due to his past relationship with Epstein,<sup>24</sup> and if so, whether that may be hindering public disclosure. Now, one of Epstein's closest confidants, a sex offender serving a 20-year prison term, has been transferred to a minimum-security prison following her meeting with the Deputy Attorney General. This matter is of the greatest urgency given the Department of Justice's horrendous treatment of Epstein and Maxwell's victims, including the Office of the U.S. Attorney for the Southern District of Florida's failure to notify Epstein and Maxwell's victims prior to entering into a September 24, 2007, non-prosecution agreement with Epstein that ended that federal investigation;<sup>25</sup> the Bureau of Prison's failure to provide adequate security to Epstein where he died while being held for pre-trial detention at the Metropolitan Correctional Center in New York, New York in August 2019 forever depriving the victims of their opportunity to testify against Epstein;<sup>26</sup> and now by the Department's inexplicable decision to transfer Maxwell to a minimal security facility within days of meeting with the Deputy Attorney General, notwithstanding her conviction for sex trafficking minors.<sup>27</sup> Because this topic is of significant public importance—and the President already appears to be evading disclosure through many public comments<sup>28</sup>—under FOIA's expedited processing provisions, this request is of the utmost urgency and any delay will deprive the public of timely information necessary to evaluate the government's decision to move Maxwell to what has been referred to as “Club Fed.”<sup>29</sup>

DDF's public dissemination and media outreach are extensive, allowing it to connect with a vast and diverse audience across various platforms, making it uniquely positioned to effectively inform the public about the findings of this request.<sup>30</sup> Through a combination of investigative

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<sup>24</sup> Mike Baker and Michael S. Schmidt, *An Accuser's Story Suggests How Trump Might Appear in the Epstein Files*, The New York Times (July. 20, 2025),

<https://www.nytimes.com/2025/07/20/us/politics/epstein-employee-trump-investigation.html>.

<sup>25</sup> Brendan Pierson, *Appeals Court Upholds Jeffery Epstein's Non-Prosecution Deal*, Reuters (Apr. 14, 2020),

<https://www.reuters.com/article/world/us/appeals-court-upholds-jeffrey-epsteins-non-prosecution-deal-idUSKCN21W2G8/>.

<sup>26</sup> Department of Justice, Office of the Inspector General, *Investigation and Review of the Federal Bureau of Prisons' Custody, Care, and Supervision of Jeffery Epstein at the Metropolitan Correctional Center in New York, New York* (June 2023), <https://oig.justice.gov/sites/default/files/reports/23-085.pdf>.

<sup>27</sup> Kaitlan Collins, et al., *Ghislaine Maxwell Moved to Federal Prison Camp in Texas*, CNN (Aug. 1, 2025), <https://www.cnn.com/2025/08/01/politics/ghislaine-maxwell-federal-prison-texas>.

<sup>28</sup> See, e.g., Stephen Fowler, *Trump tells supporters not to 'waste time' on Epstein files. They're not happy*, NPR (Jul. 15, 2025), <https://www.npr.org/2025/07/14/nx-s1-5467151/trump-epstein-files-doj-fbi-maga>.

<sup>29</sup> Josh Fiallo, *Trump Sends Maxwell to Club Fed with Puppies, Anti-Aging—and Easy Escapes*, The Daily Beast (Aug. 4, 2025),

<https://www.thedailybeast.com/an-inside-look-at-ghislaine-maxwells-new-life-at-club-fed-in-bryan-texas/>.

<sup>30</sup> See e.g., Virginia Canter, et al., *Why we 'Democracy Defenders' are demanding information about DOGE*, MSNBC (Dec. 27, 2024, 3:00AM PT),

<https://www.msnbc.com/opinion/msnbc-opinion/group-launched-inquiry-musk-ramaswamys-doge-rcna185248>; see also David A. Fahrenthold, *Two Watchdogs Were Rebuffed From Joining Trump's Cost-Cutting Effort*, The New York Times (Jan. 16, 2025), <https://www.nytimes.com/2025/01/16/us/doge-trump-watchdogs.html>; see also Stephen M. Lepore, *DOGE'S brutal response to former Obama and Clinton aides attempting to join Elon Musk's cost cutting machine*, Daily Mail (Jan. 17, 2025, 1:31 EST), <https://www.dailymail.co.uk/news/article-14295275/DOGE-brutal-response-former-Obama-Clinton-aides-Elon-Mus>

reports, in-depth analyses, press releases, and dynamic engagement on multiple digital and traditional media channels, DDF ensures that critical information reaches a wide spectrum of stakeholders, from policymakers and advocacy groups to individual citizens seeking accountability in government operations.<sup>31</sup> This multifaceted approach amplifies the impact of the information obtained and facilitates informed public discourse on pressing issues.

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

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

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

There is no question that the Department's handling of the Epstein files has generated exceptional widespread media interest. For example, news and media outlets, including Fox News,<sup>32</sup> New York Times,<sup>33</sup> Wall Street Journal,<sup>34</sup> and Washington Post,<sup>35</sup> have all released

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[k.html](#); see also Travis Gettys, 'Too many to enumerate': Watchdogs open probe into Musk's alleged 'conflicts of interest', Rawstory (Dec. 27, 2024), <https://www.rawstory.com/musk-doge-ethics/>.

<sup>31</sup> State Democracy Defenders Fund, <https://statedemocracydefenders.org/fund/> (last visited Jan. 23, 2025)

<sup>32</sup> Ashley Oliver, *10 reasons the DOJ and FBI face backlash over Epstein files flop*, Fox News (July 10, 2025), <https://www.foxnews.com/politics/10-reasons-doj-fbi-face-backlash-over-epstein-files-flop>; Jacqui Heinrich, *Trump taking hits at mountain of Republicans pushing for Epstein file release*, Fox News (July 16, 2025), <https://www.foxnews.com/video/6375808075112>; <https://www.foxnews.com/video/6375726865112>.

<sup>33</sup> Luke Broadwater, *Trump Talks About Anything but Epstein on His Social Media Account*, The New York Times (July 21, 2025), <https://www.nytimes.com/2025/07/21/us/politics/trump-epstein-social-media.html>; Erica L. Green, *How Trump Deflected MAGA's Wrath Over Epstein, at Least for Now*, The New York Times (July 21, 2025), <https://www.nytimes.com/2025/07/21/us/politics/trump-epstein-maga-base.html>; Michael Gold, *Republicans and Democrats Call for More Information on Epstein Case*, New York Times (Jul. 20, 2025), <https://www.nytimes.com/2025/07/20/us/politics/trump-epstein-files.html>.

<sup>34</sup> Natalie Andrews, Annie Linskey, and Sadie Gurman, *Trump Calls for Release of "Pertinent" Epstein Grand Jury Material Following WSJ Article*, Wall St. Journal (Jul. 18, 2025), [https://www.wsj.com/politics/policy/trump-calls-for-release-of-epstein-documents-following-wsj-article-bc3c3a2b?gaa\\_at](https://www.wsj.com/politics/policy/trump-calls-for-release-of-epstein-documents-following-wsj-article-bc3c3a2b?gaa_at); Annie Linskey and Jasmine Li, *Trump Lashes Out at Supporters for Fixating on "Epstein Hoax."* Wall St. Journal (Jul. 16, 2025), [https://www.wsj.com/politics/policy/trump-jeffrey-epstein-files-supporters-4021019d?gaa\\_at](https://www.wsj.com/politics/policy/trump-jeffrey-epstein-files-supporters-4021019d?gaa_at); Editorial, *No Special Counsel for the Epstein Files*, Wall St. Journal (Jul. 17, 2025), [https://www.wsj.com/opinion/jeffrey-epstein-files-special-counsel-donald-trump-karoline-leavitt-885590f9?gaa\\_at](https://www.wsj.com/opinion/jeffrey-epstein-files-special-counsel-donald-trump-karoline-leavitt-885590f9?gaa_at).

<sup>35</sup> *Trump's "Epstein Files" Problem*, Washington Post Podcast (Jul. 15, 2025) <https://www.washingtonpost.com/podcasts/post-reports/trumps-epstein-files-problem/>; Jeremy Roebuck and Mark Berman, *Justice Dept. asks court to release Epstein grand jury testimony*, Washington Post (Jul. 18, 2025),

multiple stories related to the failure of the Department to release the Epstein files. Influential podcasters like Joe Rogan have not only attacked FBI officials for withholding the files, but specifically noted how "cynical" people have become as a result of the Department's failure to release them.<sup>36</sup> Now one of Jefferey Epstein's closest confidants who facilitated his sex abuse has been moved to minimum-security prison just days after meeting with the Deputy Attorney General and President Trump's former attorney.<sup>37</sup>

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

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

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

Sincerely,

/s/

Ambassador Norman Eisen (ret.)  
Executive Chair and Founder

/s/

Virginia Canter  
Ethics and Anticorruption Chief Counsel and Director

/s/

Gabriel Lezra  
Senior Strategist

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<https://www.washingtonpost.com/national-security/2025/07/18/bondi-epstein-files-documents-grand-jury-testimony-doj/>; Sarah Ellison, *How MAGA influencers put pressure on Trump, Bondi over Epstein*, Washington Post (Jul. 19, 2025), <https://www.washingtonpost.com/politics/2025/07/19/maga-influencers-trump-epstein/>

<sup>36</sup> Eboni Boykin-Patterson, *Joe Rogan Rips Patel and Bongino for Letting Him Down on Epstein*, The Daily Beast (Jul. 19, 2025),

<https://www.thedailybeast.com/joe-rogan-rips-kash-patel-and-dan-bongino-for-letting-him-down-on-epstein/>.

<sup>37</sup> Kaitlan Collins, et al., *Ghislaine Maxwell Moved to Federal Prison Camp in Texas*, CNN (Aug. 1, 2025), <https://www.cnn.com/2025/08/01/politics/ghislaine-maxwell-federal-prison-texas>.



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

### **Guidance Regarding the Search and Processing of Requested Records:**

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

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

The request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to the request, the request includes all prior messages sent or received in that email chain, as well as any attachments to the email. I have included potential domain names where possible to aid your search.

Please use all tools available to your agency to conduct a complete and efficient search for potentially responsive records. Agencies are subject to government-wide requirements to manage

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

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

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

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

If it is your position any portion of the requested records is exempt from disclosure, DDF requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.<sup>38</sup> If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document.<sup>39</sup> Please be advised that DDF intends to pursue all legal remedies to enforce its right under the FOIA to access these documents. Accordingly, because litigation reasonably is foreseeable, the agency should institute an agency-wide preservation hold on documents potentially responsive to this request.

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

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<sup>38</sup> See 5 U.S.C. § 552(b). See also Kathleen E. Marchsteiner & Meghan M. Stuessy, Cong. Rsch. Serv., R47984, The Federal Advisory Committee Act (FACA): Overview and Considerations for Congress (2024), <https://www.congress.gov/crs-product/R47984>.

<sup>39</sup> See *Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If you have any questions about this clarification or foresee any problems in fully releasing the requested records, please contact me at [REDACTED]. Please send the requested records to me at either [REDACTED] or Gabriel Lezra, Democracy Defenders Fund, 600 Pennsylvania Ave., S.E., Washington, D.C. 20003. Thank you for your assistance in this matter.

Sincerely,

/s/

Ambassador Norman Eisen (ret.)  
Executive Chair and Founder

/s/

Virginia Canter  
Ethics and Anticorruption Chief Counsel and Director

/s/

Gabriel Lezra  
Senior Strategist