



**Democracy
Defenders
Fund**

February 3, 2026

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Re: Freedom of Information Act Request—Communications and Meetings of DHS and Immigration Policy Officials with Contractors and Others

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 Homeland Security (“DHS”) regulations, 6 C.F.R. part 5:

Part 1: Correspondence

Any communications, including any email, Teams chat, or instant messages,¹ sent or received by the custodians in List A to or from the persons in List B.

The date range for the search should be from August 1, 2024, through the date the search is conducted.

¹ SMS text, MMS, RCS, Slack, iMessage, Signal, WhatsApp, Telegram, or direct messages on X.com, Truth Social, or similar social media app.

List A: Custodians

1. DHS Special Government Employee Corey Lewandowski
2. White House detailee Jacalynne “Jacki” Becker Klopp
3. DHS Senior Advisor Mark Hall
4. ICE ERO Acting Assistant Director of Custody Management Monica Burke
5. ICE ERO Acting Assistant Director of Operations Support Ralph Ferguson
6. ICE ERO Acting Executive Associate Director Marcos Charles
7. CBP Special Agent Gregory K. Bovino

We request that searches be made of the primary accounts and mobile devices for these officials and any other email addresses, accounts, or devices that they use for official business. We also request that the search include any personal staff reporting to these officials with responsibility for managing, sending, or receiving official correspondence on their behalf.

List B: Correspondents

1. Thomas “Tom” Douglas Homan, Border Czar
2. Brian DeMore
3. Tim Robbins
4. David Marin
5. Daniel Bible
6. Henry Lucero
7. Bart VerHulst
8. Timothy “Tim” Aitken
9. Hope Hicks

Details about these individuals and their organizational affiliations are provided below in the discussion of DDF’s fee waiver request for reference and to inform the FOIA office of the general subject matter that such correspondence would likely regard. We request that their names and any commonly known nicknames, aliases, or abbreviations be used as search terms, as well as their organizational or corporate affiliations.

Part 2: Meetings:

All calendar entries for the officials named in List A, above, including any scheduled phone calls, appointments, meetings, or events also attended by a person in List B.

The search should be conducted of their official Outlook calendars, and those of any of their immediate staff with responsibility for managing their official correspondence or calendars. If any named custodian uses paper calendars, secondary “unofficial” calendars, or another non-Outlook system for organizing their schedules, we also request a search of those records.

Part 3: Events:

All approvals from the Designated Agency Ethics Official, ethics official, or agency designee or Travel Office for travel to or attendance at any meetings, conferences, or Widely Attended Gatherings (WAGs).²

Part 4: Agency Visits:

Any entry on the agency's official visitor log reflecting the entry of any person named on List B to any DHS facility.

General Search Guidelines

Please search for responsive records regardless of format, medium, or physical characteristics. 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*. If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. 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. 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 Department regulations, 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.” 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.

First, the disclosure will shed light on DHS employees’ contacts with high-level immigration enforcement officials in the Administration, former DHS and immigration officials, and immigration detention contractors.

² The WAG exception to the federal gift ban permits employees to personally accept free attendance at certain large group events when it is in the government’s interest that the employee attend. An event qualifies as a WAG only if it meets the criteria specified in 5 C.F.R. § 2635.204(g), and an agency designee has independently reviewed and authorized the employee’s attendance in writing prior to the event.

- Tom Homan is currently the Trump Administration’s “Border Czar.” It has previously been reported that Homan accepted \$50,000 from undercover FBI agents posing as prospective government contractors on September 20, 2024.³ These payments were purportedly for the purpose of securing future contracts with the government if President Trump won re-election.
- Brian DeMore is CEO of Universal Strategic Advisors LLC (USA). Tim Robbins is Principal of Universal Strategic Advisors LLC. Prior to that position he was the Deputy Assistant Director at the U.S. Department of Homeland Security.⁴ David Marin is the Chief Talent Officer of USA. He was previously an ICE Deputy Field Office Director. Both DeMore and Marin were defendants in a lawsuit alleging that they engaged in malicious prosecution and ordered ICE agents to manufacture evidence against an ICE official as retaliation for her complaints against a hostile work environment.⁵ Marin was removed from office when the Department of Justice complained that he had engaged in misconduct that made it so that he could not be called as a witness.⁶ The misconduct involved misuse of government vehicles, waving his firearm for “unofficial purposes” and lack of candor.⁷ USA had never had a contract with DHS until 2025, when they were awarded a sole source contract for \$73 million to ““manage field office alien check-ins, monitor immigration case statuses (and the outcome), assist with coordinating removals, update contact information to ensure that the alien can be located, respond to telephone calls, triage complaints and grievances, manage outreach mailboxes, enter data into ICE’s system of record, manage alien files, capture biometrics, organize and collect immigration related documents, field questions related to the immigration process, coordinate with ICE to assign aliens to an appropriate monitoring program, and notify ICE if someone is not complying with the terms of a conditional release or when someone is a risk to community safety.””⁸
- Daniel Bible is a former executive associate director for ICE’s Enforcement and Operations division. Days before the 2024 presidential election, Bible left ICE to take a senior-level position with the GEO Group.⁹ GEO Group is one of the largest private detention companies. In recent months, GEO Group has been awarded over a billion dollars in contracts with ICE to maintain detention facilities and assist with immigration enforcement throughout the United States.¹⁰

³ Carol Leonnig & Ken Dilanian, *Tom Homan was investigated for accepting \$50,000 from undercover FBI agents. Trump's DOJ shut it down*, MS NOW (Sept. 20, 2025),

<https://www.msnbc.com/msnbc/news/tom-homan-cash-contracts-trump-doj-investigation-rcna232568>.

⁴ Timothy Robbins, LINKEDIN (Last visited Jan. 28, 2026), <https://www.linkedin.com/in/timothy-robbins-07a925190>.

⁵ *Myles v. United States*, No. 20-55910, 2022 WL 4011172 (9th Cir. Sept. 2, 2022),

<https://cdn.ca9.uscourts.gov/datastore/opinions/2022/09/02/20-55910.pdf>.

⁶ Susan McGuire Smith, *DHS Investigator Loses Job After U.S. Attorney's Complaint*, FEDSMITH.COM (Apr. 4, 2025), <https://www.fedsmith.com/2025/04/04/dhs-investigator-loses-job-after-us-attorneys-complaint/>.

⁷ *Marin v. Dep't of Homeland Sec.*, No. 2024-1767, 2025 WL 429790 (Fed. Cir. Feb. 7, 2025),

https://www.cafc.uscourts.gov/opinions-orders/24-1767_OPINION_2-7-2025_2465280.pdf.

⁸ Sam Biddle, *No-Bid ICE Contract Went to Former ICE Agents Sued for Fabricating Criminal Evidence on the Job*, THE INTERCEPT (Apr. 17, 2025), <https://theintercept.com/2025/04/17/ice-deportation-contracts-us-advisors/>.

⁹ Nick Schwellenbach & René Kladzyk, *Private Prison Giant Hired ICE Detention Chief*, PROJECT ON GOVERNMENT OVERSIGHT (Jan. 17, 2025), <https://www.pogo.org/investigates/private-prison-giant-hired-ice-detention-chief>.

¹⁰ Press Release, GEO Group, The GEO Group Awarded 15-Year Contract by U.S. Immigration and Customs Enforcement for Company-Owned, 1,000-Bed Delaney Hall Facility in New Jersey (Feb. 27, 2025),

<https://investors.geogroup.com/news-releases/news-release-details/geo-group-awarded-15-year-contract-us-immigra>

- Bart VerHulst is the Vice President of Partnership Relations at Corrections Corporation of America (CoreCivic). CoreCivic has received millions of dollars to manage private correctional facilities for both the Department of Justice and DHS.¹¹ Millions of dollars in sole source contracts have been provided by the Trump Administration to CoreCivic.¹²
- Tim Aitken is the President of Aitken Group, LLC. Prior to that he was a Field Office Director for ICE. The Aitken Group, LLC, is “a consulting firm” headed by Aitken that offers “to assist companies of all sizes in securing contracts with Federal, State, and local law enforcement agencies.”¹³
- Hope Hicks is a former White House Communications Director and was an Executive Vice President and Chief Communications Officer for Fox Corporation.¹⁴

Border Czar Homan was recently alleged to have accepted thousands of dollars in cash in return for influencing government contracting decisions.¹⁵ It has also been reported that Homan was recently involved in contracting discussions, including some that involved former clients.¹⁶ Given the bribery allegations against Border Czar Homan, there is a real risk that Homan may have used his position to influence the contracting process for detention centers which may have provided unfair advantages to certain companies. This risk is compounded by the fact that several companies, including at least one of Homan’s disclosed former clients¹⁷, have received multi-million-dollar contracts for detention centers during the Trump Administration. In addition, several companies are staffed with former DHS officials. This raises questions about

[tion-and-customs](#); Press Release, GEO Group, The GEO Group Awarded Contract by U.S. Immigration and Customs Enforcement for Provision of Skip Tracing Services (Dec. 22, 2025),
<https://investors.geogroup.com/news-releases/news-release-details/geo-group-awarded-contract-us-immigration-and-customs-1>.

¹¹ Sophie Hurwitz, *Private Prison Companies Set to Make Billions Reopening Jails for ICE*, MOTHER JONES (Mar. 6, 2025),
<https://www.motherjones.com/politics/2025/03/private-prison-mass-deportation-trump-billions-geogroup-corecivic-ice/>

¹² Heather Hollingsworth & John Hanna, *ICE is using no-bid contracts, boosting big firms, to get more detention beds*, AP News (Jun. 16, 2025),
<https://apnews.com/article/immigration-detention-centers-ice-deportations-trump-e92b67a388f041b84593d7a29fd93c54>; Adam Friedman, *Private prison operator CoreCivic saw 55% increase in immigration detainee contracts*, TENNESSEE LOOKOUT (Nov. 6, 2025),
<https://tennesseelookout.com/2025/11/06/private-prison-operator-corecivic-saw-55-increase-in-immigration-detainee-contracts/>.

¹³ Timothy Aitken, LinkedIn (Last visited Jan. 28, 2026),
https://www.linkedin.com/in/timothy-aitken-85135123?original_referer=https%3A%2F%2Fwww.google.com%2F.

¹⁴ Anna Kaufman, *Ex-Trump staffer Hope Hicks to Join Megyn Kelly’s media company as COO*, USA TODAY (Jan. 29, 2025),
<https://www.usatoday.com/story/entertainment/tv/2025/07/29/megyn-kelly-hope-hicks-podcast-company/8541975007/>.

¹⁵ Alison Durkee, *Border Czar Bribery Allegations: The Controversy Around the DOJ’s Dropped Investigation Into Tom Homan Explained*, FORBES (Sept. 22, 2025),
<https://www.forbes.com/sites/alisondurkee/2025/09/22/border-czar-bribery-allegations-the-controversy-around-the-doj-s-dropped-investigation-into-tom-homan-explained/>.

¹⁶ Fola Akinnibi et al., *Trump’s Border Czar Involved in Detention Contract Talks Despite Recusal*, BLOOMBERG (Sept. 24, 2025),
<https://www.bloomberg.com/news/features/2025-09-24/trump-s-border-czar-tom-homan-involved-in-detention-contract-talks>.

¹⁷ Ja’han Jones, *Tom Homan’s financial ties to private prison locking up immigrants raise questions*, MS NOW (Mar. 28, 2025), <https://www.ms.now/top-stories/latest/trump-border-tom-homan-private-prison-immigrants-rcna209544>.

whether these former officials are using their previous positions and contacts to secure an unfair advantage over other companies. The records requested would help identify whether any of the named individuals met with or communicated with DHS or other Administration officials about contracts with the Department, and whether there was any undue or illicit influence involved in those contacts. Disclosure of the information will significantly aid in the public's understanding of whether sole source contracts provided by the Administration were tainted by conflicts of interest.

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 issuance of op-eds. DDF maintains a dedicated website where it provides information related to its activities which can be accessed by the public. The purpose of the disclosure is to inform the public about the activities of the government.

In addition, DDF requests waiver of fees related to processing this request as a "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." 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.¹⁸ DDF experts routinely engage with the public and with other members of the news media to publicize important information, including information related to government activities and information related to information sought under the FOIA. Pursuant to existing case law, DDF clearly meets the criteria for a fee waiver under section 552(a)(4)(A)(ii)(II).

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

Request for Expedited Processing

DDF is entitled to expedited processing of this request pursuant to 5 U.S.C. § 552 and 6 C.F.R. § 5.5 because (1) there exists "[a]n urgency to inform the public about an actual or alleged Federal Government activity" and DDF is "primarily engaged in disseminating information" and (2) this is a "[a] matter of widespread and exceptional media interest involving questions about the Government's integrity which affect public confidence." 6 C.F.R. § 5.5(e)(1)(ii), (iv).

¹⁸ See, e.g., Norman Eisen, Virginia Canter, & Richard W. Painter, *A Plane from Qatar? C'Mon, Man*, THE N.Y. TIMES (May 14, 2025), <https://www.nytimes.com/2025/05/14/opinion/trump-plane-qatar-crypto.html>; Jennifer Rubin, Richard Painter, & Virginia Canter, *Trump's Crypto Conflicts of Interest*, THE CONTRARIAN (Apr. 25, 2025), <https://contrarian.substack.com/p/ginny-canter-and-richard-painter>; Virginia Canter & Christopher Swartz, *A Five-Alarm Threat to U.S. Financial Stability*, THE CONTRARIAN (Jan. 28, 2026), <https://contrarian.substack.com/p/a-five-alarm-threat-to-us-financial>; MS NOW, The Weekend (July 6, 2025), <https://www.msnbc.com/the-weekend/watch/it-s-a-stench-of-corruption-norm-eisen-warns-of-an-ethics-crisis-with-trump-s-second-term-242759237701>.

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.” 6 C.F.R. § 5.5(e)(ii). As the Supreme Court explained in *NLRB v. Robbins Tire & Rubber Co.*, “[t]he basic purpose of [the] FOIA is to ensure an informed citizenry, vital to the functioning of a democratic society, needed to check against corruption and to hold the governors accountable to the governed.” The potential that Mr. Homan or others at DHS or in the Administration used their official authority to favor outside contractors, including by providing them with sole source contracts, is the type of potential corruption that the FOIA is aimed at helping uncover. It is necessary that the public be able to access the requested records so that they can make an independent judgment about whether the contracting process was irrevocably tainted by conflicts of interest. These issues are particularly urgent because DHS has recently been provided \$150 billion dollars for additional detention centers and related activities.¹⁹ It is imperative that the public have insight into DHS’s contract practices and whether conflicts of interest or improprieties might exist. Communications and meeting records with the named individuals will assist the public in having a better understanding of whether any untoward contacts have occurred.

DDF is also “primarily engaged in disseminating information” to the public.²⁰ 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. 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.²¹ DDF management and staff frequently publish reports, op-ed, and articles in traditional and new media, including in

¹⁹ Ellen M. Gilmer, *Trump’s Immigration Enforcement Windfall Creates Oversight Risks*, BLOOMBERG GOVERNMENT (Aug. 5, 2025), <https://news.bgov.com/bloomberg-government-news/trumps-immigration-enforcement-windfall-creates-oversight-risks>.

²⁰ See, e.g. *Protect Democracy Project, Inc. v. United States Dep’t of Just.*, 498 F. Supp. 3d 132, 139 (D.D.C. 2020).

²¹ See e.g., Trump’s Power & The Rule of Law: Norman Eisen, PBS FRONTLINE (Mar. 24, 2025), <https://www.pbs.org/wgbh/frontline/interview/norman-eisen/>; Virginia Canter, et al., *Why we ‘Democracy Defenders’ are demanding information about DOGE*, MS Now (Dec. 27, 2024), <https://www.msnbc.com/opinion/msnbc-opinion/group-launched-inquiry-musk-ramaswamys-doge-reca185248>; 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>; 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), <https://www.dailymail.co.uk/news/article-14295275/DOGE-brutal-response-former-Obama-Clinton-aides-Elon-Musk.html>; 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/>.

The Contrarian which is owned by DDF's sister organization, Democracy Defenders Action.²² By utilizing a variety of news media sources, DDF is able to make its investigative findings relatable and understandable. As a result, 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 integrity of the Department of Homeland Security which affects public confidence.

DDF requests expedited processing as well under 6 C.F.R. § 5.5(e)(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.”

Dozens of news and media outlets, including Forbes, Politico, the New York Times, and CBS News, have released stories related to Homan's alleged bribery, the extensive number of contracts provided for detention centers, the presence of former DHS officials with companies providing detention center services, and the anomalous nature of some of those contracts.²³

²² Norman Eisen, et al., *The Coming Legal and Congressional Action to Fight 'The Donroe Doctrine'*, THE CONTRARIAN (Jan. 7, 2026), <https://contrarian.substack.com/p/the-coming-legal-and-congressional>; Christopher Swartz & Virginia Canter, *Congress is abandoning centuries-old ethics lessons in its crypto push*, THE HILL (Oct. 9, 2025), <https://thehill.com/opinion/finance/5545644-crypto-regulation-conflict-interest/>; Gabe Lezra, et al., *15 Ways You Can Fight for Democracy*, THE CONTRARIAN (Mar. 18, 2025), <https://contrarian.substack.com/p/15-ways-you-can-fight-for-democracy>; Jennifer Rubin & Craig Becker, *Craig Becker on the power of unions & Trump's attacks against civil institutions at large*, THE CONTRARIAN (Aug. 29, 2025) <https://contrarian.substack.com/p/craig-becker-on-the-power-of-unions>; Jennifer Rubin & Virginia Canter, *Musk Turned a Government Role into a Profit Machine: Ginny Canter on Musk's Conflicts of Interest*, THE CONTRARIAN (Jun. 6, 2025), <https://contrarian.substack.com/p/musk-turned-a-government-role-into>.

²³ See, e.g., Alison Durkee, *Border Czar Bribery Allegations: The Controversy Around The DOJ's Dropped Investigation Into Tom Homan Explained*, FORBES (Sept. 22, 2025), <https://www.forbes.com/sites/alisondurkee/2025/09/22/border-czar-bribery-allegations-the-controversy-around-the-doj-s-dropped-investigation-into-tom-homan-explained/>; Katherine Faulders, et al., *DOJ ended probe of 'border czar' Tom Homan for allegedly accepting \$50K in FBI sting*, ABC News (Sept. 21, 2025), <https://abcnews.go.com/Politics/doj-ended-probe-border-czar-tom-homan-allegedly/story?id=125781386>; Isabelle D'Antonio, *Reports: Justice Department closed probe into Trump's border czar, Tom Homan, for accepting bag of cash*, CNN (Sept. 20, 2025), <https://www.cnn.com/2025/09/20/politics/tom-homan-investigation-closed-nyt>; Devlin Barrett, et al., *Trump Justice Dept. Closed Investigation Into Tom Homan for Accepting Bag of Cash*, THE N.Y. TIMES (Sept. 20, 2025), <https://www.nytimes.com/2025/09/20/us/politics/tom-homan-fbi-trump.html>; Robert McCoy, *Tom Homan's Defense on \$50K Briber Crumbles as Exact Timelines Revealed*, THE NEW REPUBLIC (Sept. 29, 2025), <https://newrepublic.com/post/201081/tom-homan-50k-bribe-defense-timeline>; Ashleigh Fields, *Homan Denies Alleged Bribery: "bull--"*, THE HILL (Sept. 20, 2025), <https://thehill.com/homenews/administration/5514153-fbi-clears-homan-contract-probe/>; Patrick Maguire, *Senate Democrats press Trump administration for info on border czar Tom Homan and federal contracts*, CBS News (Sept. 26, 2025), <https://www.cbsnews.com/news/tom-homan-senate-democrats-federal-contracts/>; Douglas MacMillan & Aaron Schaffer, *The former private prison exec behind ICE's immigrant detention surge*, THE WASHINGTON POST (Aug. 1, 2025), <https://www.washingtonpost.com/business/2025/08/01/ice-david-venturella-geo-immigration-detention/>; Jacob Wendler, *Border czar Tom Homan denies he took \$50K from undercover agents*, POLITICO (Oct. 16, 2025), <https://www.politico.com/news/2025/10/16/tom-homan-50k-sting-operation-00611219?fbclid=IwY2xjawPoaGZleH>

Several U.S. senators have also raised concerns about whether Homan has inappropriately influenced DHS or ICE contracts.²⁴

Extensive media coverage serves as evidence of widespread interest and concern about the propriety of DHS contracting. The requested documents are essential for ensuring the public remains informed about DHS and Administration officials' contracting activities. 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. Moreover, DDF has extensive knowledge of the rules and regulations that protect against government corruption and malfeasance and is uniquely situated to understand and convey information received through this FOIA concerning potential corruption to the public.

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.

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

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
Democracy Defenders Fund

/s/

Virginia Canter
Ethics and Anticorruption Chief Counsel and Director
Democracy Defenders Fund

/s/

Christopher Swartz

RuA2FlbQIxMQBzcnRjBmFwcF9pZAEwAAEeZzyQSGLbz14OC_-Kvd67GeGZsnNvlEN9iCzNcb6xGcBGp4Hfa0xINGgK8SQ_aem_IKO0kzDXn1lBvfrgiZfqZg.

²⁴ Letter from Sen. Gary Peters Committee on Homeland Security and Governmental Affairs, Sen. Ruben Gallego, Sen. Richard Blumenthal, Sen. Elissa Slotkin, Sen. Margaret Wood Hassan, & Sen. John Fetterman to Kristi Noem (Sept. 26, 2025), https://drive.google.com/file/d/1tW8SUXxe7rWUav9xq_TkYeUnDvuuv74H/view.

Senior Ethics Counsel
Democracy Defenders Fund

Guidance Regarding the Search and Processing of Requested Records:

3. In connection with its request for records, DDF provides the following guidance regarding the scope of records sought and the search and processing of records:
4. Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics.
5. Our 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 our request, our request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
6. Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA.²⁵ It is not adequate to rely on policies and procedures that require officials to move such information to official systems within a certain period of time; DDF has a right to records contained in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.²⁶
7. In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records.
8. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
9. Please take appropriate steps to ensure that records responsive to this request are not deleted by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

²⁵ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, 827 F.3d 145, 149–50 (D.C. Cir. 2016); cf. *Judicial Watch, Inc. v. Kerry*, 844 F.3d 952, 955–56 (D.C. Cir. 2016).

²⁶ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).