

# EXHIBIT A



June 12, 2026

**VIA MAIL AND ONLINE PORTAL**

Department of Justice  
Office of Information Policy  
6th Fl.  
441 G St. NW  
Washington, DC 20530  
Via Mail and Online Portal

**Re: Expedited Freedom of Information Act Request**

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the implementing regulations of your agency, 28 C.F.R. Part 16, American Oversight makes the following request for records.

On June 8, 2026, the White House initiated the formal nomination process for Deputy Attorney General and Acting Attorney General Todd Blanche to serve as Attorney General of the United States.<sup>1</sup> Mr. Blanche served as a personal criminal defense attorney to President Donald Trump in multiple high-profile criminal cases in New York, Florida, and Washington, D.C. before his nomination for Deputy Attorney General in 2024.<sup>2</sup> More specifically, Mr. Blanche was President Trump's personal criminal defense attorney in two federal felony cases prosecuted by former Special

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<sup>1</sup> See, e.g., Aaron Pellish, *White House Sends Blanche's Attorney General Nomination to Congress*, Politico (Jun. 8, 2026, 5:04 PM), <https://www.politico.com/live-updates/2026/06/08/congress/todd-blanche-attorney-general-nomination-00953938>.

<sup>2</sup> See, e.g., Sarah Rumpf-Whitten & Emma Colton, *Trump Names His Personal Criminal Defense Attorney Todd Blanche as Deputy Attorney General*, Fox News (Nov. 14, 2024, 6:12 PM), <https://www.foxnews.com/politics/trump-names-personal-criminal-defense-attorney-todd-blanche-us-deputy-attorney-general>; NPR Washington Desk, *Trump Picks His Lawyer, Todd Blanche, As Deputy Attorney General*, NPR (Nov. 14, 2024, 7:03 PM), <https://www.npr.org/2024/11/14/g-s1-34264/trump-blanche-deputy-attorney-general-bove-sauer>; Devlin Barrett, *Trump Picks Todd Blanche, His Defense Lawyer, to Be Deputy Attorney General*, N.Y. Times, Nov. 14, 2024, <https://www.nytimes.com/2024/11/14/us/politics/todd-blanche-deputy-attorney-general-trump.html>; Andrew Goudsward & Kanishka Singh, *Trump Picks His Defense Lawyers for Top Justice Department Posts*, Reuters (Nov. 14, 2024, 7:28 PM), <https://www.reuters.com/world/us/trump-picks-his-attorney-todd-blanche-deputy-attorney-general-2024-11-14/>.



Counsel Jack Smith, whose partially unreleased report connected to these cases has been a matter of intense public interest and legal scrutiny.<sup>3</sup>

Accordingly, Mr. Blanche's past and present nominations have both been marked by questions about his—and the broader Department of Justice's—ability to remain independent and neutral.<sup>4</sup> Questions have also persisted about Mr. Blanche's loyalty to the President in his tenure at the Department of Justice (DOJ).<sup>5</sup> Furthermore, Mr. Blanche has been directly involved in high-profile and controversial matters, such as his interview with Jeffrey Epstein associate Ghislaine Maxwell, DOJ's "Anti-Weaponization Fund" arising out of a lawsuit President Trump filed against his own government, and continued developments following Jack Smith's work as special counsel.<sup>6</sup>

American Oversight seeks records that may shed light on Mr. Blanche's impartiality specifically in the context of his involvement in the review and redaction of files on Mr. Epstein's criminal activity.<sup>7</sup>

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<sup>3</sup> See, e.g., Rumpf-Whitten & Colton, *supra* note 2; Jeremy Roebuck, *Trump Formally Nominates Todd Blanche To Serve As Attorney General*, Wash. Post, Jun. 8, 2026, <https://www.washingtonpost.com/national-security/2026/06/08/trump-formally-nominates-todd-blanche-serve-attorney-general/>; Alanna Durkin & Eric Tucker, *Judge Permanently Blocks Release Of Special Counsel Jack Smith's Report On Trump Classified Documents Case*, Assoc. Press (Feb. 23, 2026, 10:20 AM), <https://www.pbs.org/newshour/politics/judge-permanently-blocks-release-of-special-counsel-jack-smiths-report-on-trump-classified-documents-case>.

<sup>4</sup> See, e.g., Andrew Goudsward & Kanishka Singh, *supra* note 2; "Nomination Hearing," U.S. Senate Committee on the Judiciary, <https://www.judiciary.senate.gov/committee-activity/hearings/02/12/2025/nominations>; Sarah N. Lynch & Joe Walsh, *Trump Formally Nominates Todd Blanche as Attorney General*, CBS News (Jun. 9, 2026, 8:33 AM), <https://www.cbsnews.com/news/todd-blanche-trump-doj-attorney-general-nomination/>.

<sup>5</sup> Lynch & Walsh, *supra* note 4; National Review, *No to Todd Blanche for Attorney General*, Jun. 10, 2026, 6:30 AM, <https://www.nationalreview.com/2026/06/no-to-todd-blanche-for-attorney-general/>; Alan Feuer, *In Seeking More on Epstein, Justice Dept.'s No. 2 Official Occupies Unusual Role*, N.Y. Times, July 23, 2025, <https://www.nytimes.com/2025/07/23/us/politics/todd-blanche-epstein-ghislaine-maxwell-trump.html>; Maggie Haberman & Jonathan Swan, *Inside the White House Freakout Over the Epstein Files*, N.Y. Times, Jun. 10, 2026, <https://www.nytimes.com/2026/06/10/magazine/trump-epstein-files-white-house-vance-doj.html>.

<sup>6</sup> See, e.g., Maxwell Interview, U.S. Department of Justice, <https://www.justice.gov/maxwell-interview>; Lynch & Walsh, *supra* note 4; National Review, *supra* note 5; Feuer, *supra* note 5; Madison Colombo, *Todd Blanche Reveals DOJ Unearthed Cache of Jack Smith Documents Inside Forgotten Room*, Fox News (Jun. 2, 2026, 10:31 AM), <https://www.foxnews.com/media/todd-blanche-reveals-doj-unearthed-cache-jack-smith-documents-inside-forgotten-room>.

<sup>7</sup> See, e.g., Breitbart, *Trump Officially Nominates Blanche As Attorney General*, Jun. 9, 2026, <https://www.breitbart.com/news/trump-officially-nominates-blanche-as-attorney->

**Requested Records**

American Oversight seeks expedited review of this request for the reasons identified below and requests that the U.S. Department of Justice produce the following records as soon as practicable, and at least within twenty business days:

1. All email communications (including emails, email attachments, complete email chains, and calendar invitations) sent or received by Todd Blanche and containing both a key term from Column A and a key term from Column B.

**Key Terms:****Column A**

- a. Epstein
- b. Maxwell

**Column B**

- i. review\*
- ii. redact\*
- iii. Trump
- iv. DJT
- v. POTUS
- vi. exemption\*
- vii. "DOE 174"
- viii. DOE174
- ix. "DOE-174"
- x. transfer\*
- xi. "Bureau of Prisons"
- xii. BOP
- xiii. "limited immunity"
- xiv. "FCI Tallahassee"
- xv. "FPC Bryan"

Please note that American Oversight is using the asterisk (\*) to designate the standard use of "wildcards" in the search for responsive records. For example, a search for "review\*" would return all of the following: review, reviewing, reviewed, etc. If your agency is unable to search for wildcards, please advise so that we may specifically include the variations that we would like searched.

To clarify, an email sent by an official that included both "Epstein" and "review\*" would be responsive. An email sent by an official that included "Epstein" but did not include any of the terms listed in Column B would not be responsive.

To the extent that your agency has the capacity to run Boolean searches, American Oversight believes the following search string is an example of one that would be most effective in the search for responsive records: "Epstein" AND ("review\*" OR "redact\*" OR "Trump"). American Oversight is available to work

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[general/amp/](#); Committee on Oversight and Government Reform, U.S. House of Representatives, "Interview of: Pamela J. Bondi," May 29, 2026, <https://oversight.house.gov/wp-content/uploads/2026/06/Final-Bondi-Transcript.pdf>.

with you to construct an appropriate search, based on your search capabilities, to most efficiently identify responsive records.

Please note that American Oversight does not seek, and that this request specifically excludes, the initial mailing of news clips or other mass-distribution emails. However, subsequent communications responding to or forwarding such emails are responsive to this request. For example, if Mr. Blanche received a mass-distribution news clip email containing a term from Column A and a term from Column B, that initial email would not be responsive to this request. However, if Mr. Blanche forwarded that email to another individual with his own commentary, that subsequent message would be responsive to this request and should be produced.

2. All text messages and messages on messaging platforms (such as Signal, Slack, GChat or Google Hangouts, Lync, Skype, X (formerly Twitter) direct messages, Facebook messages, Microsoft Teams messages, WhatsApp, Telegram, Parler, Mattermost, Wickr, TeleMessage, TM SGNL or any app that can interface with an app such as those listed or otherwise borrow its technology) sent or received by Todd Blanche and containing the term “Epstein”.

American Oversight requests that full message threads/conversations be produced. For example, if an official sent or received a text message containing the term “Epstein,” the complete thread/conversation for the timeframe listed below should be produced, and not just the message containing the key term.

**For both parts of this request, please provide all responsive records from March 10, 2025, through May 7, 2025.**

### **Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii) and your agency’s regulations, American Oversight requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures will likely contribute to a better understanding of relevant government procedures by the general public in a significant way. Moreover, the request is for non-commercial purposes.

American Oversight requests a waiver of fees because disclosure of the requested information is “in the public interest because it is likely to contribute significantly to public understanding of operations or activities of the government.”<sup>8</sup> The public has a significant interest in the qualifications, work, and background of the individual nominated to be the country’s top law enforcement officer, including whether he can be expected to perform the role with the requisite impartiality and objectivity.<sup>9</sup> Records with the potential to shed light on this question would contribute significantly to public understanding of operations of the federal government, including whether and to what

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<sup>8</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>9</sup> See *supra* notes 4–6.

extent Mr. Blanche remained impartial in his involvement in the review and redaction of files on Mr. Epstein's criminal activity.<sup>10</sup> American Oversight is committed to transparency and makes the responses agencies provide to FOIA requests publicly available, and the public's understanding of the government's activities would be enhanced through American Oversight's analysis and publication of these records.

This request "is not primarily in the commercial interest of the requester."<sup>11</sup> In fact, as a 501(c)(3) nonprofit, American Oversight does not have a commercial purpose, and the release of the information requested is not in American Oversight's commercial interest. American Oversight's mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).<sup>12</sup>

American Oversight has also demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website.<sup>13</sup> Examples reflecting this commitment include the posting of records related to the first Trump Administration's contacts with Ukraine and analyses of those contacts;<sup>14</sup> posting records and editorial content about the federal government's response to the COVID-19 pandemic;<sup>15</sup> posting records received as part of American Oversight's "Audit the Wall" project to gather and analyze information related to the first Trump administration's proposed construction of a barrier along the U.S.-Mexico border, and analyses of what those records reveal;<sup>16</sup> the posting of records related to an

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<sup>10</sup> See *supra* note 7.

<sup>11</sup> 5 U.S.C. § 552(a)(4)(A)(iii).

<sup>12</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,400 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jun. 12, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jun. 12, 2026).

<sup>13</sup> See generally *Our Latest*, American Oversight, <https://www.americanoversight.org/blog>.

<sup>14</sup> *The Trump Administration's Contacts with Ukraine*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-contacts-with-ukraine>.

<sup>15</sup> See generally *The Trump Administration's Response to Coronavirus*, American Oversight, <https://www.americanoversight.org/investigation/the-trump-administrations-response-to-coronavirus>; see, e.g., *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>.

<sup>16</sup> See generally *Audit the Wall*, American Oversight, <https://www.americanoversight.org/investigation/audit-the-wall>; see, e.g., *Audit the Wall: No Plans, No Funding, No Timeline, No Wall*, American Oversight, <https://americanoversight.org/audit-the-wall-no-plans-funding-or-timeline-and-no-wall/>.



ethics waiver received by a senior Department of Justice attorney and an analysis of what those records demonstrated regarding the Department's process for issuing such waivers;<sup>17</sup> and posting records and analysis of federal officials' use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.<sup>18</sup>

Accordingly, American Oversight qualifies for a fee waiver.

### **Application for Expedited Processing**

Pursuant to 5 U.S.C. § 552(a)(6)(E)(1) and 28 C.F.R. § 16.5(e)(1)(ii), (iv), American Oversight requests that your agency expedite the processing of this request.

I certify to be true and correct to the best of my knowledge and belief that the information requested is urgently needed to order to inform the public about actual or alleged government activity.<sup>19</sup> On May 29, 2026, former Attorney General Pamela "Pam" Bondi testified before the U.S. House of Representatives.<sup>20</sup> Her testimony described her involvement in the review and redaction of files on Mr. Epstein's criminal activity.<sup>21</sup> Ms. Bondi also described the extent of Mr. Blanche's involvement in that review process, testifying that, "[a]s the head of a large department with broad responsibilities, I did not lead every aspect of this effort nor conduct that document review myself. I delegated that oversight over this process to Deputy Attorney General Todd Blanche."<sup>22</sup> This specific statement garnered significant media interest in the days following the release of Ms. Bondi's testimony.<sup>23</sup>

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<sup>17</sup> *DOJ Records Relating to Solicitor General Noel Francisco's Recusal*, American Oversight, <https://www.documentcloud.org/documents/25544090-doj-records-relating-to-solicitor-general-noel-franciscos-recusal-american-oversight>; *Francisco & the Travel Ban: What We Learned from the DOJ Documents*, American Oversight, <https://www.americanoversight.org/francisco-the-travel-ban-what-we-learned-from-the-doj-documents>.

<sup>18</sup> See generally *Swamp Airlines: Chartered Jets at Taxpayer Expense*, American Oversight, <https://www.americanoversight.org/investigation/swamp-airlines-private-jets-taxpayer-expense>; see, e.g., *New Information on Pompeo's 2017 Trips to His Home State*, American Oversight, <https://www.americanoversight.org/new-information-on-pompeos-2017-trips-to-his-home-state>.

<sup>19</sup> 28 C.F.R. § 16.5(e)(1)(ii).

<sup>20</sup> Committee on Oversight and Government Reform, U.S. House of Representatives, "Interview of: Pamela J. Bondi," May 29, 2026, <https://oversight.house.gov/wp-content/uploads/2026/06/Final-Bondi-Transcript.pdf> ("Bondi Transcript").

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> See, e.g., Elaine Mallon, *Bondi's Replacement Saddled with Epstein Baggage as He Awaits Grueling Confirmation Battle*, Fox News (Jun. 5, 2026, 3:26 PM), <https://www.foxnews.com/politics/bondi-replacement-saddled-epstein-baggage-awaits-grueling-confirmation-battle>; Breitbart, *Trump Officially Nominates Blanche As Attorney General*, Jun. 9, 2026, <https://www.breitbart.com/news/trump-officially-nominates-blanche-as-attorney-general/>; Haley Fuchs, *Bondi Punts Blame for the Epstein Files to Todd Blanche*, Politico (Jun. 4, 2026, 6:09 PM),

Ms. Bondi's testimony on Mr. Blanche's involvement in the redaction and review of the files follows years of interest in the criminal activities of Jeffrey Epstein and his associates, including the extent of President Trump's relationship with Epstein.<sup>24</sup> The Epstein Files Transparency Act (EFTA) was passed in response to long-standing and outsized public interest in these matters.<sup>25</sup> Public interest increased in light of public reporting that the U.S. government directed Federal Bureau of Investigation personnel to flag instances where President Trump's name appeared in the files as part of this review and redaction process.<sup>26</sup> Questions about the Department of Justice's handling of those files have recently prompted Representative James Comer, chair of the U.S. House

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<https://www.politico.com/news/2026/06/04/todd-blanche-pam-bondi-epstein-files-00951134>; Annie Grayer et al., *Todd Blanche Was 'in Charge' of Epstein Matter, Bondi Told Lawmakers*, according to new transcript, CNN, Jun. 4, 2026, <https://www.cnn.com/2026/06/04/politics/pam-bondi-epstein-testimony-todd-blanche-transcript>; Melissa Quinn, *Oversight Committee Chair Says He's Working to Have Blanche Testify in Epstein Investigation*, CBS News (Jun. 10, 2026, 11:39 AM), <https://www.cbsnews.com/news/todd-blanche-jeffrey-epstein-house-oversight-committee-james-comer/>; Peter Charalambous et al., *Bondi Invoked Privilege, Declined to Answer Questions about Interactions with Trump about Epstein Files*, ABC News (Jun. 4, 2026, 10:22 PM), <https://abcnews.com/Politics/bondi-invoked-privilege-declined-answer-questions-interactions-trump/story?id=133598250>.

<sup>24</sup> See, e.g., David B. Caruso, *What We Know So Far About the Jeffrey Epstein Documents*, PBS News (Jan. 4, 2025, 9:51 AM), <https://www.pbs.org/newshour/nation/what-we-know-so-far-about-the-jeffrey-epstein-documents>; Andrea Vacaciano & Michael Ruiz, *Epstein Grand Jury Records Released, Describe Trafficker's Network For 'Grooming' Underage Girls*, Fox News (updated Jul. 1, 2024, 5:49 PM), <https://www.foxnews.com/us/epstein-grand-jury-records-released-describe-traffickers-network-grooming-underage-girls>; Khadeeja Safdar & Joe Palazzolo, *Jeffrey Epstein's Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was from Donald Trump.*, Wall St. J. (Jul. 17, 2025, 6:45 PM), <https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common-f918d796>.

<sup>25</sup> See, e.g., Sylvia Goodman & Joe Sonka, *Thomas Massie-Led Petition on Epstein Files Gets Final Signature, Queuing Up Floor Vote*, Louisville Public Media (Nov. 13, 2025, 10:35 AM), <https://www.lpm.org/news/2025-11-13/thomas-massie-led-petition-on-epstein-files-gets-final-signature-queuing-up-floor-vote>; Claudia Grisales, *House and Senate Both Approve Releasing the Epstein Files by a Near Unanimous Margin*, NPR (Nov. 18, 2025, 5:47 PM), <https://www.npr.org/2025/11/18/nx-s1-5611438/epstein-files-bill-house-vote>.

<sup>26</sup> See, e.g., Ketherine Faulders et al., *DOJ, Pressured By Trump Supporters, Pushes FBI To Release More Epstein Files: Sources*, ABC 7, Mar. 20, 2025, <https://abc7chicago.com/post/jeffrey-epstein-doj-pressured-trump-supporters-pushes-fbi-release-more-files-sources/16057882/>; Press Release, *Durbin Presses Bondi, Patel, Bongino On Rifts Between DOJ, FBI, White House On Epstein Files*, U.S. Sen. Dick Durbin, Jul. 18, 2025, <https://www.durbin.senate.gov/newsroom/press-releases/durbin-presses-bondi-patel-bongino-on-rifts-between-doj-fbi-white-house-on-epstein-files> ("Durbin Press Release"); Allison Gill, *The Epstein Cover-Up at the FBI*, The Breakdown, Jul. 20, 2025, <https://www.muellershewrote.com/p/the-epstein-cover-up-at-the-fbi>.



Committee on Oversight and Reform, to take steps toward having Mr. Blanche testify before the Committee.<sup>27</sup>

Moreover, I certify to be true and correct to the best of my knowledge and belief that there is an urgent need to inform the public about the nature of Mr. Blanche's involvement in the review and redaction of files on Mr. Epstein's criminal activity ahead of Mr. Blanche's imminent confirmation hearing in the U.S. Senate.<sup>28</sup> House Oversight Chair Comer's stated interest in having Mr. Blanche testify before the U.S. House compounds this urgency.<sup>29</sup> The public has an urgent need for more information on Mr. Blanche's involvement in the review of the files ahead of his expected testimony before the Senate Judiciary Committee, particularly as questions of Mr. Blanche's impartiality and loyalty to the President—for whom he has served as a personal attorney—persist.<sup>30</sup> Mention of President Trump in the Epstein files and his well-documented relationship with Jeffrey Epstein further underscore the urgent need to understand Mr. Blanche's involvement in this matter as the nation's nominee for top prosecutor.<sup>31</sup>

I also certify to be true and correct to the best of my knowledge and belief that there is widespread and exceptional media interest, and there exist possible questions concerning the government's integrity, which affect public confidence. Questions about Mr. Epstein's death and the extent of his network, including high-profile figures such as President Trump, have been of exceptional media interest for years.<sup>32</sup> That President

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<sup>27</sup> Melissa Quinn, *Oversight Committee Chair Says He's Working to Have Blanche Testify in Epstein Investigation*, CBS News (Jun. 10, 2026, 11:39 AM), <https://www.cbsnews.com/news/todd-blanche-jeffrey-epstein-house-oversight-committee-james-comer/>.

<sup>28</sup> No date for this hearing has yet been set, although news sources report that it will likely be scheduled in July 2026. *See, e.g.*, Theodoric Meyer & Perry Stein, *Trump's Attorney General Pick Stares Down Senate Confirmation Hurdles*, Wash. Post, Jun. 10, 2026, <https://www.washingtonpost.com/politics/2026/06/10/trumps-attorney-general-pick-stares-down-senate-confirmation-hurdles/>.

<sup>29</sup> *See supra* note 27.

<sup>30</sup> Sarah N. Lynch & Joe Walsh, *Trump Formally Nominates Todd Blanche as Attorney General*, CBS News (Jun. 9, 2026, 8:33 AM), <https://www.cbsnews.com/news/todd-blanche-trump-doj-attorney-general-nomination/>; National Review, *No to Todd Blanche for Attorney General*, Jun. 10, 2026, 6:30 AM, <https://www.nationalreview.com/2026/06/no-to-todd-blanche-for-attorney-general/>; Alan Feuer, *In Seeking More on Epstein, Justice Dept.'s No. 2 Official Occupies Unusual Role*, N.Y. Times, Jul. 23, 2025, <https://www.nytimes.com/2025/07/23/us/politics/todd-blanche-epstein-ghislaine-maxwell-trump.html>.

<sup>31</sup> *See, e.g.*, Durbin Press Release, *supra* note 26; Gill, *supra* note 26; Safdar & Palazzolo, *supra* note 24.

<sup>32</sup> *See, e.g.*, Madison Czopek & Gabrielle Lazor, *The Facts and Timeline of Trump and Epstein's Falling Out*, PBS News (Jul. 31, 2025, 7:24 PM), <https://www.pbs.org/newshour/politics/the-facts-and-timeline-of-trump-and-epsteins-falling-out>; Michael R. Sisak et al., *Medical Examiner Rules Epstein Death a Suicide by Hanging*, AP (Aug. 16, 2019, 10:10 PM), <https://apnews.com/article/a947e0d85d31496eb5bd9ff4994c9718>.

Trump is both mentioned in the files evidencing Mr. Epstein's criminal activities and has overseen the agency charged with review of these files—under the direction of figures including Mr. Blanche—have been a matter of intense media scrutiny, raising questions of public trust.<sup>33</sup> According to public opinion reports, high numbers of Americans across political demographics believe that the Trump Administration has hurt efforts to hold Mr. Epstein's associates accountable.<sup>34</sup> Mr. Blanche, for his part, was reportedly involved in a controversial prison transfer of Mr. Epstein's associate Ghislaine Maxwell.<sup>35</sup> While Mr. Blanche cited security concerns for the move, recent reporting potentially connects it to White House efforts to minimize exposure for President Trump in connection with the Epstein Files.<sup>36</sup> More broadly, the Administration's redaction and review of the files on Mr. Epstein's criminal activity, including its reported flagging of mentions of the president's name, have most specifically called into question the integrity of the government.<sup>37</sup> Recent reporting about turmoil and disputes inside the government about what to reveal to the public about the files and appearance of accusations against the president has also resulted in questions about government integrity.<sup>38</sup> Where Mr. Blanche is reportedly involved, particularly as President Trump's former personal criminal defense attorney, questions of integrity are at a zenith.<sup>39</sup> For example, CNN reported yesterday that a group of 19 Epstein survivors have announced their opposition Mr. Blanche's nomination.<sup>40</sup> Media interest is only expected to broaden and intensify as Mr. Blanche's confirmation hearing looms.

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<sup>33</sup> See, e.g., Mallon, *supra* note 23; Durbin Press Release, *supra* note 26; Gill, *supra* note 26.

<sup>34</sup> See, e.g., Jason Lange, *Few Americans See Trump Administration Delivering Justice in Epstein Cases*, Reuters/Ipsos Poll Finds, Reuters (Jun. 10, 2026, 6:02 AM), <https://www.reuters.com/world/us/few-americans-see-trump-administration-delivering-justice-epstein-cases-2026-06-10/>.

<sup>35</sup> See, e.g., Jacob Wendler, *Deputy AG Todd Blanche Defends Moving Ghislaine Maxwell to Minimum-Security Prison*, Politico (Dec. 21, 2025, 12:41 PM), <https://www.politico.com/news/2025/12/21/todd-blanche-defends-moving-ghislaine-maxwell-00702240>; Carrie Johnson, *Justice Department Releases Transcripts from Its Conversations with Ghislaine Maxwell*, NPR (Aug. 22, 2025, 7:19 PM), <https://www.npr.org/2025/08/22/nx-s1-5494553/epstein-maxwell-doj-interview-transcripts>.

<sup>36</sup> See Maggie Haberman & Jonathan Swan, *Inside the White House Freakout Over the Epstein Files*, N.Y. Times, Jun. 10, 2026, <https://www.nytimes.com/2026/06/10/magazine/trump-epstein-files-white-house-vance-doj.html>.

<sup>37</sup> See, e.g., Durbin Press Release, *supra* note 26; Gill, *supra* note 26; Sadie Gurman et al., *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, Wall St. J. (July 23, 2025, 3:08 PM), <https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files-727a8038>.

<sup>38</sup> See Haberman & Swan, *supra* note 36.

<sup>39</sup> See, e.g., Quinn, *supra* note 27; Bondi Transcript, *supra* note 20.

<sup>40</sup> See Jake Tapper & Annie Grayer, *Group of Epstein Survivors Announce Opposition to Todd Blanche's Attorney General Nomination*, CNN, June 11, 2026, <https://www.cnn.com/2026/06/11/politics/epstein-survivors-blanche-nomination>.

Moreover, I certify to be true and correct to the best of my knowledge and belief that there exist possible questions concerning the government's integrity regarding whether and to what extent the review of the files under on Mr. Epstein's criminal activity, reportedly under Mr. Blanche's supervision, were conducted in a complete, speedy, and impartial manner.<sup>41</sup> Ms. Bondi testified that Mr. Blanche was "in charge of the [redaction] process and the entire release of the Epstein files."<sup>42</sup> This not only raises questions about Mr. Blanche's role in any errors or delays in the review of the file, but also further compounds questions about his impartiality in his current roles at DOJ and potential position as Attorney General.<sup>43</sup>

According to 28 C.F.R. § 16.5(e)(2), "[r]equests for expedited processing that are based on [28 C.F.R. § 16.5(e)(1)(iv)] must be submitted to the Director of Public Affairs at the Office of Public Affairs, Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530-0001." However, based on our prior efforts to comply with that provision on other requests, our understanding is that by submitting our request to OIP, we are in compliance with that requirement. **If that understanding is incorrect, please let us know as soon as possible via the below contact information.**

I further certify that American Oversight is primarily engaged in disseminating information to the public. American Oversight's mission is to promote transparency in government, to educate the public about government activities, and to ensure the accountability of government officials. Similar to other organizations that have been found to satisfy the criteria necessary to qualify for expedition,<sup>44</sup> American Oversight "gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw material into a distinct work, and distributes that work to an audience."<sup>45</sup> American Oversight uses the information gathered, and its analysis of it, to educate the public through reports, press releases, and other media. American Oversight also makes materials it gathers available on its public website and promotes their availability on social media platforms, such as Facebook and X (formerly Twitter).<sup>46</sup> As

<sup>41</sup> See, e.g., Quinn, *supra* note 27; Bondi Transcript, *supra* note 20; Fuchs, *supra* note 23; Mallon, *supra* note 23.

<sup>42</sup> See Bondi Transcript, *supra* note 20. See also, Fuchs, *supra* note 23; Mallon, *supra* note 23.

<sup>43</sup> See, e.g., Quinn, *supra* note 27; Bondi Transcript, *supra* note 20; Fuchs, *supra* note 23; Mallon, *supra* note 23; Thomas et al., *Top DOJ Official Denies There's Any Effort to Redact Mentions of President Trump from Epstein Files*, ABC News (Dec. 20, 2025, 8:12 PM), <https://abcnews.com/Politics/top-doj-official-denies-effort-redact-mentions-president/story?id=128574448>; Meyer & Stein, *supra* note 28.

<sup>44</sup> See *ACLU v. U.S. Dep't of Justice*, 321 F. Supp. 2d 24, 30–31 (D.D.C. 2004); *Elec. Privacy Info. Ctr. v. Dep't of Defense* ("EPIC"), 241 F. Supp. 2d 5, 15 (D.D.C. 2003).

<sup>45</sup> *ACLU*, 321 F. Supp. 2d at 29 n.5 (quoting *EPIC*, 241 F. Supp. 2d at 11).

<sup>46</sup> American Oversight currently has approximately 16,000 followers on Facebook and 94,400 followers on X (formerly Twitter). American Oversight, Facebook, <https://www.facebook.com/weareoversight/> (last visited Jun. 12, 2026); American Oversight (@weareoversight), X (formerly Twitter), <https://x.com/weareoversight> (last visited Jun. 12, 2026).

discussed previously, American Oversight has demonstrated its commitment to the public disclosure of documents and creation of editorial content.<sup>47</sup>

Accordingly, American Oversight's request satisfies the criteria for expedition.

### **Guidance Regarding the Search & Processing of Requested Records**

In connection with its request for records, American Oversight provides the following guidance regarding the scope of the records sought and the search and processing of records:

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks "communications," please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or X (formerly Twitter) direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms "record," "document," and "information" in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind.
- 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.

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<sup>47</sup> See generally *News*, American Oversight, <https://www.americanoversight.org/blog>; see, e.g., *Emails and Resume of Trump's Pick to Head Government Personnel Office*, American Oversight, <https://www.americanoversight.org/emails-and-resume-of-trumps-pick-to-head-government-personnel-office>; *CDC Calendars from 2018 and 2019: Pandemic-Related Briefings and Meetings*, American Oversight, <https://www.americanoversight.org/cdc-calendars-from-2018-and-2019-pandemic-related-briefings-and-meetings>; *State Department Releases Ukraine Documents to American Oversight*, American Oversight, <https://www.americanoversight.org/state-department-releases-ukraine-documents-to-american-oversight>; *Documents Reveal Ben Carson Jr.'s Attempts to Use His Influence at HUD to Help His Business*, American Oversight, <https://www.americanoversight.org/documents-reveal-ben-carson-jr-s-attempts-to-use-his-influence-at-hud-to-help-his-business>; *Investigating the Trump Administration's Efforts to Sell Nuclear Technology to Saudi Arabia*, American Oversight, <https://www.americanoversight.org/investigating-the-trump-administrations-efforts-to-sell-nuclear-technology-to-saudi-arabia>; *Sessions' Letter Shows DOJ Acted On Trump's Authoritarian Demand to Investigate Clinton*, American Oversight, <https://www.americanoversight.org/sessions-letter>.

- 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.<sup>48</sup> 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; American Oversight 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.<sup>49</sup>
- 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,<sup>50</sup> 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, outside of network drives, in paper format, or in personal email accounts.
- 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. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- 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

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<sup>48</sup> 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).

<sup>49</sup> See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).

<sup>50</sup> Presidential Memorandum—Managing Government Records, 76 Fed. Reg. 75,423 (Nov. 28, 2011), <https://obamawhitehouse.archives.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>; Office of Mgmt. & Budget, Exec. Office of the President, Memorandum for the Heads of Executive Departments & Independent Agencies, “Managing Government Records Directive,” M-12-18 (Aug. 24, 2012), <https://www.archives.gov/files/records-mgmt/m-12-18.pdf>.



basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

### **Conclusion**

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to American Oversight, please do not hesitate to contact American Oversight. American Oversight welcomes an opportunity to discuss its request with you before you undertake your search or incur search or duplication costs. By working together at the outset, American Oversight and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records to American Oversight, please also provide responsive material on a rolling basis.

We share a common mission to promote transparency in government. American Oversight looks forward to working with your agency on this request. If you do not understand any part of this request, please contact Ben Sparks at [foia@americanoversight.org](mailto:foia@americanoversight.org) or (202) 873-1741. Also, if American Oversight's request for expedition is not granted or its request for a fee waiver is not granted in full, please contact us immediately upon making such a determination.

Sincerely,

/s/ Ben Sparks

Ben Sparks  
on behalf of  
American Oversight