

EXHIBIT C



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.¹ 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., prior to Mr. Blanche's nomination for Deputy Attorney General in 2024.² More specifically, Mr. Blanche was President Trump's personal criminal defense attorney in two federal felony cases led by former Special

¹ 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>.

² 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, *Trump Picks His Lawyer, Todd Blanche, As Deputy Attorney General*, 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.³

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.⁴ Questions have also persisted about Mr. Blanche's loyalty to the President in his tenure at the Department of Justice (DOJ).⁵ 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.⁶

American Oversight seeks records that may shed light on Mr. Blanche's impartiality, specifically in the context of his involvement in any matters relating to the unreleased

³ 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*, PBS News (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>.

⁴ See, e.g., Goudsward & 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/>.

⁵ 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, Jul. 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>.

⁶ 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>.

second volume of Special Counsel Smith's report, as he stated during his initial, February 2025 confirmation hearing that he did not support publishing it.⁷

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. Smith
- b. "special counsel"
- c. Lago
- d. classified
- e. mishandle
- f. mishandled
- g. mishandling
- h. records
- i. documents
- j. Cannon
- k. publish*
- l. releas*
- m. MAL

Column B

- i. "volume II"
- ii. "vol II"
- iii. "vol. II"
- iv. "volume 2"
- v. "vol 2"
- vi. "vol. 2"

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 "publish*" would return all of the following: publish, publishes, publishing, 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.

⁷ See, e.g., 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>; Alanna Durkin & Eric Tucker, *Judge Permanently Blocks Release Of Special Counsel Jack Smith's Report On Trump Classified Documents Case*, PBS News (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>; U.S. Senate Committee on the Judiciary, "Nomination Hearing," Feb. 12, 2025, 10:15 AM, <https://www.judiciary.senate.gov/committee-activity/hearings/02/12/2025/nominations>.

To clarify, an email sent by an official that included both “Smith” and “volume II” would be responsive. An email sent by an official that included “Smith” 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: “Smith” AND (“volume II” OR “vol II” OR “vol. II”). American Oversight is available to work 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 any of the key terms listed below.

Key Terms:

- A. “Jack Smith”
- B. Cannon
- C. “volume II”
- D. “vol II”
- E. “vol. II”
- F. “volume 2”
- G. “vol 2”
- H. “vol. 2”

American Oversight requests that full message threads/conversations be produced. For example, if Mr. Blanche sent or received a text message containing any of the key terms listed above, 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 December 1, 2025, through December 31, 2025, and from January 23, 2026, through February 23, 2026, and from April 2, 2026, through May 2, 2026.

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."⁸ 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.⁹ 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 extent Mr. Blanche remained impartial in his involvement in the Department of Justice's handling of matters relating to Special Counsel Smith's report.¹⁰ 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."¹¹ 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

⁸ 5 U.S.C. § 552(a)(4)(A)(iii).

⁹ See *supra*, notes 4–6.

¹⁰ See, e.g., Alexander Mallin, *Trump Asks Judge to Keep Blocking Release of Final Report On Classified Documents Probe*, ABC News (Dec. 2, 2025, 4:23 PM), <https://abcnews.com/US/trump-asks-judge-blocking-release-final-report-classified/story?id=128052445>; 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>; U.S. Senate Committee on the Judiciary, "Nomination Hearing," Feb. 12, 2025, 10:15 AM, <https://www.judiciary.senate.gov/committee-activity/hearings/02/12/2025/nominations>.

¹¹ 5 U.S.C. § 552(a)(4)(A)(iii).

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).¹²

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.¹³ Examples reflecting this commitment include the posting of records related to the first Trump Administration's contacts with Ukraine and analyses of those contacts;¹⁴ posting records and editorial content about the federal government's response to the COVID-19 pandemic;¹⁵ 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;¹⁶ the posting of records related to an 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;¹⁷ and posting records and analysis of federal officials' use of taxpayer dollars to charter private aircraft or use government planes for unofficial business.¹⁸

¹² 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).

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

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

¹⁵ 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>.

¹⁶ 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/>.

¹⁷ *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>.

¹⁸ 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>.

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 in order to inform the public concerning actual or alleged government activity.¹⁹ On February 23, 2026, U.S. District Judge Aileen Cannon granted a request from President Trump to prohibit the release of the second volume of Special Counsel Jack Smith's report on the President's alleged mishandling of classified documents.²⁰ Special Counsel Smith had been pursuing two criminal cases against the President for these matters until the President's re-election in November 2024, at which point Special Counsel Smith moved to dismiss the cases pursuant to DOJ Office of Legal Counsel's position that a sitting president is immune from criminal prosecution while in office.²¹ Both the Special Counsel's report and the President's activity detailed therein have been matters of outsized public scrutiny for years.²²

Furthermore, on June 8, 2026, President Trump officially nominated Mr. Blanche for Attorney General.²³ Mr. Blanche previously represented the President as his personal criminal defense attorney in both matters investigated by Special Counsel Smith.²⁴

¹⁹ 28 C.F.R. § 16.5(e)(1)(ii).

²⁰ See, e.g., Alanna Durkin & Eric Tucker, *Judge Permanently Blocks Release of Special Counsel Jack Smith's Report on Trump Classified Documents Case*, PBS News (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>.

²¹ See, e.g., Alec Schemmel, *Special Counsel Jack Smith's Federal Trump Cases Cost Taxpayers More Than \$50 Million*, *Financials Show*, Fox News (Nov. 26, 2024, 1:03 PM), <https://www.foxnews.com/politics/special-counsel-jack-smiths-federal-trump-cases-cost-taxpayers-more-than-50-million-financials-show>.

²² See, e.g., Schemmel, *supra* note 21; Durkin & Tucker, *supra* note 20; Joel B. Pollak, *PBS Documentary: January 6 Committee Was Created as Propaganda 'Miniseries'*, *Breitbart*, Feb. 1, 2024, <https://www.breitbart.com/entertainment/2024/02/01/pbs-documentary-january-6th-committee-was-tv-miniseries/>; Nicholas Fandos & Emily Cochrane, *After Pro-Trump Mob Storms Capitol, Congress Confirms Biden's Win*, *N.Y. Times*, Jan. 6, 2021, <https://www.nytimes.com/2021/01/06/us/politics/congress-gop-subvert-election.html>; Kaitlan Collins et al., *FBI Executes Search Warrant At Trump's Mar-a-Lago in Document Investigation*, *CNN* (Aug. 9, 2022, 6:56 PM), <https://www.cnn.com/2022/08/08/politics/mar-a-lago-search-warrant-fbi-donald-trump>.

²³ 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>.

²⁴ 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

Because of Mr. Blanche's looming confirmation hearing before the U.S. Senate, there is urgency in attaining records relating to Mr. Blanche's actual or potential work on matters relating to the Special Counsel's report.²⁵

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 extent to which Mr. Blanche was involved in any DOJ work related to the Special Counsel's report, specifically due to Mr. Blanche's nomination and imminent hearing.²⁶ Matters related to the Special Counsel's work continue to develop at DOJ and are a point of public interest.²⁷ Particularly as Mr. Blanche explicitly stated in his February 2025 confirmation hearing as Deputy Attorney General that he would not support the release of the Special Counsel's full report, there is urgent need to inform the public about this matter prior to Mr. Blanche's confirmation hearing.²⁸

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 regarding the government's integrity, which affect public confidence. Since Mr. Blanche's nomination for Attorney General, there has been widespread and exceptional media interest in Mr. Blanche's history as the President's personal criminal defense attorney.²⁹

PM), <https://www.foxnews.com/politics/trump-names-personal-criminal-defense-attorney-todd-blanche-us-deputy-attorney-general>; 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*, PBS News (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>.

²⁵ 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/>.

²⁶ *Id.*

²⁷ *See, e.g.*, Durkin & Tucker, *supra* note 20; 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>; Glenn Thrush, *Trump Names More Foes He Wants Prosecuted as Bondi and Patel Look On*, N.Y. Times, Oct. 15, 2025, <https://www.nytimes.com/2025/10/15/us/politics/trump-bondi-patel-blanche-oval-office.html>.

²⁸ *See* U.S. Senate Committee on the Judiciary, "Nomination Hearing," Feb. 12, 2025, 10:15 AM, <https://www.judiciary.senate.gov/committee-activity/hearings/02/12/2025/nominations>.

²⁹ *See* 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/>.

This follows the pattern of intensive media coverage of Mr. Blanche's prior nomination to be Deputy Attorney General in late 2024, where his role as the President's personal attorney, including his defense of the President in the matters investigated by the Special Counsel, was also a focus of attention.³⁰

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 the extent to which Mr. Blanche has been involved in matters relating to the Special Counsel's report and his impartiality therein. Mr. Blanche's role as the President's personal criminal defense attorney was the subject of Senator Adam Schiff's questions in Mr. Blanche's original confirmation hearing before the U.S. Senate in February 2025.³¹ Senator Schiff specifically asked Mr. Blanche if he would support the release of the Special Counsel's report; Mr. Blanche said he would not.³² Because of Mr. Blanche's history with the President, there are compelling questions about Mr. Blanche's impartiality in his involvement in diverse and controversial matters relating to the President.³³ The original matters underlying the Special Counsel's cases against the

[general/](#); Meyer & Stein, *supra* note 25; Michael Macagnone & Ryan Tarinelli, *Blanche Heads Into Attorney General Confirmation Clash*, Roll Call (Jun. 8, 2026, 5:13 PM), <https://rollcall.com/2026/06/08/blanche-heads-into-attorney-general-confirmation-clash/>; Eric Garcia, *Trump's Todd Blanche for AG Nomination Is the Ultimate 'Shoot a Man on Fifth Avenue' Moment for Republicans*, Independent (Jun. 11, 2026, 8:30 PM) <https://www.the-independent.com/news/world/americas/us-politics/trump-todd-blanche-attorney-general-b2992844.html>; Sam Levine, *'I Love You, Sir': Todd Blanche, Devoted Trump Enforcer, Tapped to Do His Bidding Full Time*, The Guardian (Jun. 8, 2026, 5:51 PM), <https://www.theguardian.com/us-news/2026/jun/08/who-is-todd-blanche-trump-attorney-general-pick>; Ava-joye Burnett, *What to Know About Trump's Nomination of Todd Blanche to Be Attorney General*, Scripps News (Jun. 9, 2026, 3:32 PM), <https://www.scrippsnews.com/politics/what-to-know-about-trumps-nomination-of-todd-blanche-to-be-attorney-general>; Pellish, *supra* note 23; Victor Nava & Samuel Chamberlain, *Trump Announces Todd Blanche Will Become 'Permanent' Attorney General*, N.Y. Post (Jun. 4, 2026, 6:39 AM), <https://nypost.com/2026/06/04/us-news/trump-announces-todd-blanche-will-become-permanent-attorney-general/>.

³⁰ See, e.g., 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/>; Rumpf-Whitten & Colton, *supra* note 24; NPR, *Trump Picks His Lawyer, Todd Blanche, As Deputy Attorney General*, Nov. 14, 2024, 7:03 PM, <https://www.npr.org/2024/11/14/g-s1-34264/trump-blanche-deputy-attorney-general-bove-sauer>.

³¹ See *supra* note 28.

³² *Id.*

³³ See, e.g., Barrett & Thrush, *supra* note 27; Elaine Mallon, *Bondi's Replacement Saddled With Epstein Baggage As He Awaits Grueling Confirmation Battle*, Fox News (Jun. 5, 2026,

President, and in particular the President's alleged mishandling of classified documents after his first term, continue to provoke public interest and invite questions into the government's integrity as Mr. Blanche is nominee for Attorney General.³⁴

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,³⁵ 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."³⁶ 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).³⁷ As discussed previously, American Oversight has demonstrated its commitment to the public disclosure of documents and creation of editorial content.³⁸

3:26 PM), <https://www.foxnews.com/politics/bondi-replacement-saddled-epstein-baggage-awaits-grueling-confirmation-battle>.

³⁴ See, e.g., 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/>; Colombo, *supra* note 27.

³⁵ 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).

³⁶ *ACLU*, 321 F. Supp. 2d at 29 n.5 (quoting *EPIC*, 241 F. Supp. 2d at 11).

³⁷ 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).

³⁸ 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*

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.
- 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.³⁹ It is not adequate to rely on policies and procedures that require officials to move such information to official systems

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>.

³⁹ 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).

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.⁴⁰

- 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,⁴¹ 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 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

⁴⁰ See *Competitive Enter. Inst. v. Office of Sci. & Tech. Policy*, No. 14-cv-765, slip op. at 8 (D.D.C. Dec. 12, 2016).

⁴¹ 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>.

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 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