
From: Steve Hajjar <shajjar@fec.gov>
Sent: Friday, February 4, 2022 10:31 AM
To: Katherine N. Reynolds <KReynolds@dickinson-wright.com>
Cc: Rock A. Wood <RWood@dickinson-wright.com>
Subject: EXTERNAL: RE: Follow Up on FOIA Request 2022-15

Katherine,

As I mentioned in our call that other appeal is expected to be taken up at the next executive session that is scheduled for mid-February. Thank you for the additional information and your list of priorities. This is helpful. We are working diligently to provide additional non-exempt responsive materials and hope to have some for you soon.

Please let me know if you have any additional questions.

From: Katherine N. Reynolds <KReynolds@dickinson-wright.com>
Sent: Wednesday, February 2, 2022 12:57 PM
To: Steve Hajjar <shajjar@fec.gov>
Cc: Rock A. Wood <RWood@dickinson-wright.com>
Subject: Follow Up on FOIA Request 2022-15
Importance: High

Steve—

Thank you again for taking the time to discuss our client's FOIA request with us. Your insights were enlightening and much appreciated. Following up on our discussion last week, I wanted to address three things.

First, do you have a status update on the Commission's response to our FOIA request? I know we discussed the FOIA Appeal that raised substantially similar issues to ours. Specifically, I wanted to

see (1) if the Commission made any determination on that appeal that is relevant to our request; (2) if they have, when we can expect to receive a response from FOIA; and (3) if not, when you expect for the issue to be re-raised. Given the current litigation, time is of the essence on this, so any helpful information you have is much appreciated.

Second, we wanted to confirm with you that our initial response is not our formal appeal of the Commission's determination on our request. As we discussed, it was difficult to properly appeal anything given the limited information we had at the time we wrote the letter. Therefore, this email serves as a confirmation that our response letter was not a formal appeal. We will submit a formal appeal regarding the Commission's final determination once we receive the additional information necessary to do so. This is based on your comment that the time for an appeal has not begun to run, and that there is not a hard deadline for filing such an appeal based on 11 C.F.R. § 4.8, so that we could file an appeal after you/the FEC fully respond as to specifically what will be withheld and on what basis.

Third, in an effort to assist your document production, below is a list of documents we view to be a priority. This list is provided in response to your suggestion that we prioritize our requests so that we could receive the most important items sooner, rather than waiting for everything to be processed. Please note that this list in no way is intended to narrow the scope of our original request. This list is provided solely in the interests of getting the documents we view to be the most important in a timely manner.

1. Any Statements of Reason regarding the MURs listed in our original FOIA Request. (Please note that this document is the most important document to us, and we would like this document as soon as it can be produced)
2. Any and all communications between Commissioner Weintraub and any outside organization regarding the MURs listed in our request or the NRA Entities (NRA-PVF and NRA-ILA).
3. Any and all communications between Commissioner Weintraub and any reporter and/or representative of a media organization regarding the MURs or the NRA Entities.
4. Any and all communications between Commissioner Weintraub with Campaign Legal Center, Citizens for Responsibility and Ethics in Washington (CREW), Giffords, or Democracy 21 on any Section 30109(a)(8) litigation (or "delay suits") by the Commission.
5. Any and all communications between Commissioner Weintraub with any news media outlet on Section 30109(a)(8) litigation (or "delay suits") by the Commission.
6. Any and all communications between Commissioner Weintraub and Shane Goldmacher regarding Section 30109(a)(8) litigation (or "delay suits") by the Commission.

Thanks for your assistance with this! If our understanding as set forth above is incorrect in any way, please let me know. Please also let me know if you have further questions or would like to discuss.

Katie

Katherine N. Reynolds Associate Attorney

International Square Phone 202-659-6944
1825 Eye St. N.W. Fax 844-670-6009

Suite 900
Washington, D.C. 20006 Email KReynolds@dickinsonwright.com

[Profile](#) [V-Card](#)



The information contained in this e-mail, including any attachments, is confidential, intended only for the named recipient(s), and may be legally privileged. If you are not the intended recipient, please delete the e-mail and any attachments, destroy any printouts that you may have made and notify us immediately by return e-mail.

Neither this transmission nor any attachment shall be deemed for any purpose to be a "signature" or "signed" under any electronic transmission acts, unless otherwise specifically stated herein. Thank you.