

EXHIBIT 34



Deborah M. Waller
Supervisory Government Information Specialist
Office of the Inspector General, Office of General Counsel
950 Pennsylvania Ave., NW, Room 4726
Washington, DC 20530
oigfoia@usdoj.gov
Sent by email

October 21, 2020

Dear Ms. Waller:

This is a Freedom of Information Act (FOIA) request pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Please timely furnish to the Indiana Federal Community Defenders (IFCD) a complete copy of any and all records maintained by your agency that are:

- (1) from any date, and are records pertaining to any attempted or completed escape(s) from MDC Los Angeles reported or discovered on March 7, 2003;
- (2) dated from 2002-2003, and are records pertaining to trafficking contraband (including but not limited to illegal drugs) at MDC Los Angeles; and
- (3) dated from 2002-2003, and are records pertaining to investigations into MDC Los Angeles staff members for trafficking contraband (including but not limited to illegal drugs) at MDC Los Angeles.

IFCD believes that your office would have such records in your possession because on April 11, 2003, U.S. Department of Justice Office of Inspector General Special Agent Paul J. Leonard was present for an interview of a witness that discussed trafficking contraband at MDC LA. The interview may have been precipitated by the March 7, 2003, discovery of an escape attempt. Agent Leonard was present for this interview along with an FBI Special Agent and a BOP Special Investigative Agent. The FBI 302 memorializing this interview refers to File # 58A-LA-233773 and 90C-LA-233614.

By way of illustration only and not limitation, please furnish: files, transcripts, documents, notes, worksheets, applications, reviews, chain of custody forms, memoranda, reports, interviews, correspondence, pictures, drawings, tests, test results, and any and all information pertaining to the above-referenced incident(s).

If documents are denied in part or in whole, please specify the exemption(s) claimed for each partial or complete denial. If you excise any material, please “black out” the material rather than “white out” or “cut out.”

This office also requests a fee waiver in light of the fact that it is a non-profit organization, and because the content of the records would be of public interest and contribute to understanding and oversight of security at MDC Los Angeles. If a fee waiver is not granted, please send an estimate prior to copying the materials. This office reserves all rights to appeal any denial of a fee waiver, as well as any redaction or decision not to release information.

Please send a memo (copying this office) to the appropriate units to ensure that no records related to this request are destroyed. Please advise of any destructions of records and include the date and authority of such destruction.

Please send your response to the IFCD to the attention of Assistant Federal Defender Italia Patti, at the following address or email address:

Italia Patti, Assistant Federal Defender
Indiana Federal Community Defenders
111 Monument Circle, Suite 3200
Indianapolis, IN 46204
italia_patti@fd.org

If you have any questions regarding this request, please contact Italia Patti at 317.383.3520 or italia_patti@fd.org.

Sincerely,

s/ Italia Patti
Assistant Federal Defender
Indiana Federal Community Defenders