

EXHIBIT I

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April 11, 2019

By Overnight Mail and Email

Arnetta Mallory, FOIA Initiatives Coordinator
National Security Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W., Room 6150
Washington, D.C. 20530-0001

Dear Ms. Mallory:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552, regarding electronic surveillance conducted by the federal government under the Foreign Intelligence Surveillance Act of 1978, P.L. 95-511, 92 Stat. 1783 (“FISA”), as amended by the FISA Amendments Act of 2008, P.L. 110-261, 122 Stat. 2436. This request is filed on behalf of a client who prefers to remain anonymous at present.

Specifically, this request concerns the circumstances surrounding the counterintelligence investigation into Carter Page and other individuals who supported the election of President Donald J. Trump. Senator Graham has already requested all of these documents, so we expect no delay in a response to this request. See Letter from Lindsey Graham to William Barr, March 7, 2019. We are filing a similar request with the FBI.

We respectfully request that you produce:

- 1. All documents and communications originally shared with the Gang of Eight in May 2018 related to the investigation into Russian interference in the 2016 election.**
- 2. The “Woods file” related to the application for (and subsequent renewals of) a FISA order authorizing surveillance on Carter Page. The term “Woods file” includes, but is not limited to, any document concerning or relating to any attempt to verify the accuracy of any alleged facts stated in the FISA applications for Mr. Page.**
- 3. All documents and communications referring or relating to efforts to verify the contents of the “Steele dossier.” The term “Steele dossier” includes, but is not limited to, a series of intelligence reports prepared by Christopher Steele that were transmitted to, among others, the Department.**
- 4. All documents and communications referring or relating to the role or extent to which the Steele Dossier factored into the Carter Page FISA application.**

GENE C. SCHAERR
GSchaerr@Schaerr-Jaffe.com
(202) 787-1060 (office)
(202) 361-1061 (mobile)

SCHAERR | JAFFE LLP
1717 K Street NW, Suite 900
Washington, DC 20006
www.Schaerr-Jaffe.com

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5. All documents and communications referring or relating to Christopher Steele's contacts with members of the media and the reliability of the information provided, directly or indirectly, by Christopher Steele.

6. All documents and communications that govern the procedures, standards, rules, regulations, or policies that the Department, including the Federal Bureau of Investigation, must follow in seeking a FISA warrant from the FISC.

7. All documents and communications with the FISC referring or relating to any FISA applications associated with Carter Page or other individuals on or associated with Donald Trump's 2016 presidential campaign.

8. All FD-302s for Bruce Ohr and any other individual at the Department, the FBI, or elsewhere in the federal government who received information from individuals outside the Department or the FBI that was used in the Carter Page FISA applications.

9. All documents and communications referring or relating to defensive briefings provided—or that were under consideration to be provided—to the presidential campaigns of Hillary Clinton, Donald Trump, or any other 2016 presidential candidate.

Please produce responsive records in electronic form in lieu of a paper production. If a portion of responsive records may be produced more readily than the remainder, we request that those records be produced first and that the remaining records be produced on a rolling basis. If redaction under 5 U.S.C. § 552(b) can make any responsive but exempt material nonexempt, please produce such materials in redacted form.

We are prepared to pay up to \$2000 for the material in question. Please contact me if the fees associated with this request exceed that figure. And please do not hesitate to contact me if you have other questions about this request.

Thank you in advance for your attention and assistance.

Sincerely,



Gene C. Schaerr