

# **Exhibit 2**



February 11, 2022

Privacy Office, Mail Stop 0655  
U.S. Department of Homeland Security  
2707 Martin Luther King Jr. AVE SE  
Washington, DC 20528-065  
RE: FREEDOM OF INFORMATION ACT REQUEST

Dear FOIA Officer:

This letter constitutes a request under the federal Freedom of Information Act (FOIA), 5 U.S.C. § 552. A recent DHS Security Bulletin was issued on February 7, 2022 that raised several concerns among lawmakers and outside organizations that federal law enforcement powers were being exercised to target lawful political or other speech of Americans expressing views contrary to those currently controlling the levers of government. This requests records related to or referenced in that communication.

Specifically, we are seeking:

- 1) Records related to MDM: All records created in the development, approval, and application of the term MDM (mis- dis- and mal-information). We are looking for records sent to, by, or including the following individuals:
  - a. Alejandro Mayorkas
  - b. John Tien
  - c. Eric Hysen
  - d. Alice Lugo
  - e. Marsha Espinosa
  - f. Katherine Culliton-Gonzalez
  - g. Dmitri Kusnezov
  - h. Robert Silvers
  - i. John D. Cohen
  - j. Eva A. Millona
  - k. Jen Easterly
- 2) Records related to the phrase “false or misleading narratives”: All records created in the development, approval, application, and use of the phrase “false or misleading narratives and conspiracy theories” as it relates to foreign and domestic threats.
- 3) External Communications: All records exchanged between the above list of DHS officials and those in the Executive Office of the President, Office of the Vice President, Office of Management and Budget, Federal Communications Commission, or Department of Justice that include the following phrases or any combination of them:
  - a. Mis-information



- b. Dis-information
  - c. Mal-information
  - d. False narrative
  - e. Misleading narrative
  - f. Conspiracy theories
  - g. Fake news
  - h. Perceived ideological opponents
- 4) Communications with non-governmental entities: All records exchanged between the above list of DHS officials and individuals working for or representing Facebook, Twitter, YouTube, Apple, Amazon, or Google that include the following phrases or any combination of them:
- a. Mis-information
  - b. Dis-information
  - c. Mal-information
  - d. False narrative
  - e. Misleading narrative
  - f. Conspiracy theories
  - g. Fake news
  - h. Perceived ideological opponents
- 5) The time frame for this search should be January 21, 2021 through the date the search has begun.

“Records” means information and documents of any kind, including, but not limited to: documents (handwritten, typed, electronic, or otherwise produced, reproduced, or stored), letters, emails (including attachments), facsimiles, memoranda, correspondence, notes, databases, drawings, diagrams, maps, graphs, charts, photographs, minutes of meetings, calendar entries, meeting agendas, summaries of telephone conversations, notes and summaries of interviews, electronic and magnetic recordings of meetings, Microsoft Teams meetings records (including meeting requests, attendees, attached documents, and chats) and Teams conversations, and any other compilation of data from which information can be obtained. The term “records” also includes any personal email messages, telephone voice mails or text messages, and internet ‘chat’ or social media messages. It also includes any attachments to such documents or information.

We prefer to receive the report and all records in electronic format. To the extent practicable, we seek electronic copies of the records in native file format, or, if that is not practicable, with full metadata for all fields. 5 U.S.C. § 552(a)(3)(B) (agency shall provide records in any form or format if the record is readily reproducible in that form or format).

The Center to Advance Security in America (CASA) is a nonpartisan organization dedicated to improving the safety and security of the American people. CASA educates and informs the American people about the actions of their government and its officials that impact their safety; peace and security; democracy, civil rights, and civil liberties; and privacy.



CASA is focused on public education, and all materials and information requested will be disseminated to the public for this purpose. Thus, the disclosure of the requested records would not be to our primary benefit but would be to the primary benefit of the general public. For these reasons, we request a fee waiver pursuant to the FOIA Act, which provides for fee waivers when: (1) “disclosure of the requested information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government”; and (2) disclosure “is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A)(iii); see 40 C.F.R. § 2.107(l)(1).

If this request is denied in whole or part, please justify all such denials by reference to specific exemptions, and provide an explanation of why DHS “reasonably foresees that disclosure would harm an interest” protected by that exemption or why “disclosure is prohibited by law[.]” 5 U.S.C. § 552(a)(8). Please also ensure that all segregable portions of otherwise exempt material are released.

If you have any questions regarding this request, please feel free to contact me at [aturner@advancing-america.org](mailto:aturner@advancing-america.org).

CASA looks forward to your determination within 20 working days of this request, as is required by FOIA. 5 U.S.C. § 552(a)(6)(A)(i). Thank you in advance for your assistance in this matter.

Sincerely,

Adam Turner  
Director  
Center to Advance Security in America  
1802 Vernon St., NW  
#2095  
Washington, DC 20009