

EXHIBIT 1

SENT VIA: ONLINE PORTAL

April 6, 2023

Department of Homeland Security
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065

Dear FOIA Officer,

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and the implementing FOIA regulations of the Department of Homeland Security (DHS), 6 CFR Part 5, I respectfully request the following:

1. Memorandum for Neil Kinkopf, Senior Counselor, Office of Legal Counsel, from Neal Swartz, Associate General Counsel for General Law, DHS, *Re: Retaining Private Counsel for a Federal Official Subject to Impeachment Processes* (Oct. 27, 2022).
2. All communications with the Department of Justice relating to *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).
3. All communications external to the Federal Government relating to *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).
4. All communications with Congress relating to *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).
5. All communications with the Office of White House Counsel relating to *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).
6. All records relating to Debevoise & Plimpton and impeachment.
7. All records relating to PIID 70RDAD23C00000002.

8. All records related to the time of public release of *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).

Please limit the search for this request to the following time periods: August 9, 2021 to present. Please include the following Department components in any search: Office of the Secretary, including the Office of the General Counsel.

The terms “pertaining to,” “referring,” “relating,” or “concerning” with respect to any given subject means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any manner whatsoever pertinent to that subject.

The term “record” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, inter-office and intra-office communications, electronic mail (emails), MMS or SMS text messages, instant messages, messaging systems (such as iMessage, Microsoft Teams, WhatsApp, Telegram, Signal, Google Chat, Twitter direct messages, Lync, Slack, and Facebook Messenger), contracts, cables, telexes, notations of any type of conversation, telephone call, voicemail, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electronic records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. By definition, a “communication” (as that term is defined herein) is also a “record” if the means of communication is any written, recorded, or

graphic matter of any sort whatsoever, regardless of how recorded, and whether original or copy.

The terms “and” and “or” should be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The terms “all,” “any,” and “each” should each be construed as encompassing any and all. The singular includes the plural number, and vice versa. The present tense includes the past and vice versa. The masculine includes the feminine and neuter genders.

The term “communication” means each manner or means of disclosure or exchange of information (in the form of facts, ideas, inquiries, or otherwise), regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in an in-person meeting, by telephone, facsimile, e-mail (desktop or mobile device), text message, MMS or SMS message, regular mail, telexes, releases, or otherwise.

“Communications with,” “communications from,” and “communications between” means any communication involving the related parties, regardless of whether other persons were involved in the communication, and includes, but is not limited to, communications where one party is cc’d or bcc’d, both parties are cc’d or bcc’d, or some combination thereof.

The term “person” is defined as any natural person or any legal entity, including, without limitation, any business or governmental entity or association, and all subsidiaries, divisions, partnerships, properties, affiliates, branches, groups, special purpose entities, joint ventures, predecessors, successors, or any other entity in which they have or had a controlling interest, and any employee, and any other units thereof.

The term “employee” means a current or former: officer, director, shareholder, partner, member, consultant, senior manager, manager, senior associate, permanent employee, staff employee, attorney, agent (whether de jure, de facto, or apparent without limitation), advisor, representative, attorney (in law or in fact), lobbyist (registered or unregistered), borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, provisional employee, or subcontractor.

The term “Congress” refers to any person (as that term is defined herein) exercising power derived directly or indirectly from Article I of the Constitution.

A record bearing any notation not a part of the original text is to be considered a separate record. A draft or non-identical copy is a separate record within the meaning of this term.

Please consider all members of a document “family” to be responsive to the request if any single “member” of that “family” is responsive, regardless of whether the “family member” in question is “parent” or “child.”

This 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.

In the interest of expediency and to minimize the research and/or duplication burden on your staff, please send records electronically if possible. If this is not possible, please notify me before sending to the mailing address listed below. If access to this request will take longer than twenty business days, please let me know when I might receive records or be able to inspect the requested records. Please produce responsive documents as soon as they become available. In all cases, please communicate with me at the below email address.

Please comply fully with 5 U.S.C. § 552(b). Accordingly, without limitation to the foregoing, if any portion of this request is denied for any reason, please provide written notice of the records or portions of records that are being withheld and cite each specific exemption of the Freedom of Information Act on which the agency relies. Moreover, to the extent that responsive records may be withheld in part, produce all reasonably segregable portions of those records. Additionally, please provide all responsive documents even if they are redacted in full.

Fee Waiver Request

This request is primarily and fundamentally for non-commercial purposes. I am an investigative columnist for The Heritage Foundation’s national news outlet *The Daily Signal*. As part of a 501(c)(3) nonprofit, *The Daily Signal* does not have a commercial purpose and the release of the information requested is not in The Heritage Foundation’s commercial interest. The Heritage Foundation’s mission is to formulate and promote public policies based on the principles of free enterprise, limited government, individual freedom, traditional American values, and a strong national defense. The requested information is in the public interest as

this is an issue of national controversy which has been covered extensively by national broadcast media¹ and national print media.² This is an issue of national controversy about whether Secretary Mayorkas should have hired a private law firm to represent him in impeachment processes and whether there was legal or factual justification for the contract.³

Because this is a request by a member of the news media for information of public interest, made in my capacity as an author for *The Daily Signal*⁴ (a major news outlet⁵), as an investigative columnist, I actively gather information of potential interest to our Daily Signal audience, and I use my editorial skills to turn raw materials into a distinct work, and I distribute that work to our Daily Signal audience through podcasts⁶ or articles.⁷ I request that you waive all applicable fees associated with this request.

¹ Fox News. (Accessed: 2023, Feb. 16). DHS tapped left-leaning firm for potential Mayorkas impeachment efforts over southern border crisis. <https://www.foxnews.com/politics/dhs-tapped-left-leaning-firm-potential-mayorkas-impeachment-efforts-over-southern-border-crisis>.

² National Review. (Accessed: 2023, February 16). Mayorkas Says He Won't Resign amid GOP Outcry over Border Crisis. <https://www.nationalreview.com/news/mayorkas-says-he-wont-resign-amid-gop-outcry-over-border-crisis/>.

³ Fox News. (Accessed: 2023, Feb. 27). Oversight Committee probes 'no-bid' DHS contract to law firm to handle Mayorkas impeachment efforts. <https://www.foxnews.com/politics/oversight-committee-probes-no-bid-dhs-contract-law-firm-handle-mayorkas-impeachment-efforts>.

⁴Daily Signal. (Accessed: 2022, February 18). Mike Howell. <https://www.dailysignal.com/author/mike-howell/>

⁵Daily Signal. [@DailySignal] (Accessed: 2022, February 18). 73.7K Followers Twitter. <https://twitter.com/DailySignal>

⁶Apple. (Accessed: 2022, March 4). The Daily Signal Podcast. <https://podcasts.apple.com/us/podcast/the-daily-signal-podcast/id1313611947>

⁷ The Daily Signal. (Accessed: 2023, March 27). *EXCLUSIVE: FBI Devoted at Least 16,000 More Hours to Jan. 6 Riot Than to BLM Riots in DC*. <https://www.dailysignal.com/2023/03/20/exclusive-fbi-devoted-at-least-16000-more-hours-to-jan-6-riot-than-to-blm-riots-in-d-c/>. The Daily Signal. (Accessed: 2023, March 27). *Archives Lawyer Won't Say Who Blocked Statement on Biden Classified Documents*. <https://www.dailysignal.com/2023/03/09/archives-lawyer-cant-say-who-blocked-statement-on-biden-classified-documents/>. The Daily Signal. (Accessed: 2023, March 27). *7 Facts I Discovered During My Visit to East Palestine*. <https://www.dailysignal.com/2023/03/01/7-facts-i-discovered-during-my-visit-to-east-palestine/>. The Daily Signal. (Accessed: 2023, March 27) *Biden Picks Major Recipient of Pfizer Research Dollars to Oversee Cancer Institute*. <https://www.dailysignal.com/2022/08/22/biden-picks-major-recipient-of-pfizer-research-dollars-to-oversee-cancer-institute/>. The Daily Signal. (Accessed: 2023, March 27). *DC's Solution to Illegal Immigrants Bused From Texas: 'Put Them on Train to Miami'*. <https://www.dailysignal.com/2022/07/22/dcs-solution-to-illegal-immigrants-bused-from-texas-put-them-on-train-to-miami/>. The Daily Signal. (Accessed: 2023, March 27). *Well-Intentioned AmeriCorps Now Rotten to Core After Falling to Woke Left*. <https://www.dailysignal.com/2023/02/22/well-intentioned-ameri-corps-now-rotten-core-falling-woke-left/>. The Daily Signal. (Accessed: 2023, March 27). *What the New Document Dump Says About Biden's VP Papers*. <https://www.dailysignal.com/2023/02/13/were-more-biden-classified-documents-stored-in->

If you deny this request for a fee waiver, please advise me in advance of the estimated charges if they are to exceed \$50. Please send me a detailed and itemized explanation of those charges.

Request for Expedited Processing:

Pursuant to 6 C.F.R. § 5.5(e)(1)(iv), I request expedited processing for this request. I certify the following statement of facts in support of expedited processing to be true and correct pursuant to 6 C.F.R. § 5.5(e)(1)(iv).

Background:

1. In the current and preceding Congress, three Resolutions have been introduced in the House. *See* H. Res. 582, 117th Cong.; H. Res. 8, 118th Cong.; and H. Res 89, 118th Cong. Secretary Mayorkas hired Debevoise & Plimpton LLP to represent him in the impeachment processes on January 26, 2023.

2. The Office of Legal Counsel issued an Opinion⁸ on whether DHS can hire private counsel to represent Secretary Mayorkas in impeachment processes. The Opinion concluded that Secretary Mayorkas could do so if DHS lacked the internal capacity to defend against an impeachment. DHS claims that it lacks the capacity to handle an impeachment inquiry, but the Opinion offers no view on whether the DHS resources are sufficient and accepts DHS's sole justification for hiring outside counsel.

[boston/](https://www.dailysignal.com/2023/01/17/document-reveals-fbis-investigative-interest-in-protests-at-justices-homes-although-no-action-taken/). The Daily Signal. (Accessed: 2023, March 27). *FBI Had Investigative Interest in Protests at Justices' Homes, but Apparently Took No Action, Document Reveals*.

<https://www.dailysignal.com/2023/01/17/document-reveals-fbis-investigative-interest-in-protests-at-justices-homes-although-no-action-taken/>. The Daily Signal. (Accessed: 2023, March 27). *Democrat on House Financial Services Committee Hired FTX Crypto Kingpin's Brother*.

<https://www.dailysignal.com/2022/11/15/democrat-on-house-financial-services-committee-hired-ftx-crypto-kingpins-brother/>. The Daily Signal. (Accessed: 2023, March 27). *These 6 GOP Senators Who Voted to Confirm Mayorkas Won't Condemn Him After Revelation in False 'Whipping' Charge*.

<https://www.dailysignal.com/2022/10/20/these-6-gop-senators-who-voted-to-confirm-mayorkas-wont-condemn-him-after-revelation-in-false-whipping-charge/>. The Daily Signal. (Accessed: 2023, March 27). *6 Takeaways to Know on Newly Released Trump, National Archives Documents*.

<https://www.dailysignal.com/2022/10/04/6-takeaways-to-know-on-newly-released-trump-national-archives-documents/>. The Daily Signal. (Accessed: 2023, March 27). *By the Numbers: How Many Men in California Prisons Identify as Women*. <https://www.dailysignal.com/2022/06/14/by-the-numbers-how-many-men-in-california-prisons-identify-as-women/>.

⁸ *Retaining Private Counsel to Represent the DHS Secretary in Impeachment Processes*, 47 Op. O.L.C. __ (OLC Jan. 4, 2023).

DHS has not made public its factual basis for concluding that the OLC Opinion is applicable to its retention of Debevoise.

3. The DHS obligated an amount of \$1.5 million with the discretionary option for the total potential award to total \$3 million.⁹ The contract was awarded on a sole source basis. The contract's current end date extends through January 2, 2025. The contract is being funded by the DHS's Office of the General Counsel in the Immediate Office of the Secretary.

4. DHS's sole source justification provides DHS's explanation for why DHS only considered Debevoise in its sole-source search.¹⁰ DHS's sole-source search began in October of 2022 before the midterm elections occurred. It was a sole-source search because DHS claimed that only Debevoise & Plimpton LLP had the necessary experience to represent Secretary Mayorkas. DHS stated it conducted a sole-source search because of the urgency of the matter and the ongoing House activity.

Expedited Processing is Warranted under 6 C.F.R. § 5.5(e)(1)(iv).

1. This section provides that requests for expedited processing "will" be granted when the request involves "[a] matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence."

Section 6 C.F.R. § 5.5(e)(1)(iv) mirrors the Department of Justice regulation governing expedited processing, 28 C.F.R. § 16.5(e)(1)(iv), which provides that expedited processing shall be granted regarding: "A matter of widespread and exceptional media interest in which there exists possible questions about the government's integrity which affect public confidence."

Courts have held that the DOJ Regulation requires the requester to show: (1) that the request involves a "matter of widespread and exceptional media interest" (28 C.F.R. § 16.5(e)(1)(iv)); and (2) that the matter is one "in which there exists possible questions about the integrity of the government that affect public confidence" (*id.*). See *Edmonds v. FBI*, No. 02-cv-1294 (ESH), 2002 WL 32539613, *3 (D.D.C. Dec. 3,

⁹ USA Spending. (Accessed: 2023, Feb. 22). AWARD PROFILE: Contract Summary. https://www.usaspending.gov/award/CONT_AWD_70RDAD23C00000002_7001_-NONE_-NONE-

¹⁰ J&A No. FY23-021.

2002). It is not necessary to show “prejudice or a matter of current exigency to the American public.” *Id.*

First, the DOJ Regulation requires showing that the matter about which questions of integrity have been raised is the subject of widespread national media attention. *See Am. Oversight v. DOJ*, 292 F.Supp.3d 501, 507–508 (D.D.C. 2018) (denying motion for expedited processing because general media interest in Solicitor General’s nomination is insufficient to show media interest in possible ethics questions concerning the nomination). There need not be a showing that the disclosure would shed considerable light on agency operations; only that there is “exceptional” and “widespread” media interest. *See CREW v. DOJ*, 870 F.Supp.2d 70, 81 (D.D.C. 2012), *rev’d on other grounds*, 746 F.3d 1082 (D.C. Cir. 2014). While the media interest need be “widespread” and “exceptional” it need not be overwhelming. *See ACLU*, 321 F.Supp.2d at 31–32 (rejecting DOJ’s position that requester’s citation to what the court described as “only a handful of articles” was insufficient to show “widespread and exceptional media interest” because those articles “were published in a variety of publications and repeatedly reference the ongoing national discussion about the Patriot Act and Section 215” (second quotation added)); *Edmonds*, 2002 WL 32539613, at *3 (numerous national newspaper and network television broadcasts concerning whistleblower’s allegations of security lapses in FBI translator program met test).¹¹

Second, the DOJ Regulation requires showing that “there exists *possible* questions about the government’s integrity that affect public confidence.” *CREW v. DOJ*, 436 F.Supp.3d 354, 361 (D.D.C. 2020) (*quoting* 28 C.F.R. § 16.5(e)(1)(4)) (emphasis by Court).¹² It does not “require the requester to prove wrongdoing by the government in order to obtain documents on an expedited basis.” *Id.* at 362. “The primary way to determine whether such possible questions exist is by examining the state of public coverage of the matter at issue, and whether that coverage surfaces possible ethics issues so potentially significant as to reduce public confidence in governmental institutions.” *Am. Oversight v. DOJ*, 292 F.Supp.3d 501, 508 (D.D.C. 2018). This is not an extraordinarily high bar. *See, e.g.*, *CREW*, 436 F.Supp.3d at 361 (complaint sufficient to survive a motion to dismiss where it alleged Attorney General’s action regarding disclosure of Mueller Report “supported an inference that

¹¹ *Cf.* 28 C.F.R. § 16.5(e)(3) (“The existence of numerous articles published on a given subject can be helpful in establishing the requirement that there be an ‘urgency to inform’ the public on the topic.”).

¹² To be sure, this standard does not require expedition of any questions concerning government integrity. *See, e.g.*, *White v. DOJ*, 16 F.4th 539, 544 (7th Cir. 2021) (test not met in case where records sought to cast doubt on requestors’ criminal conviction where requestor claimed he was subject to an elaborate government sting operation).

at best, the Attorney General undertook to frame the public discussion on his own terms, and at worst that he distorted the truth”); *ACLU v. DOJ*, 321 F.Supp.2d 24, 32 (D.D.C. 2004) (allegations in press that Section 215 of the Patriot Act may be unconstitutional and reports that Members of Congress have alleged abuses of Section 215 “implicate[] government integrity” and hence are sufficient to meet test); *Edmonds*, 2002 WL 32539613, at *3–4 (test met where plaintiff alleged security lapses in FBI translators program, national news covered the issue, and two Senators expressed concern regarding “the significant security issues raised by plaintiff’s allegations and the integrity of the FBI”).¹³

2. The facts amply support expedition here. When the contract with the New York-based firm Debevoise & Plimpton became public, it was instantly very controversial for two main reasons. There are many questions about whether the DHS and Secretary Mayorkas should have hired a large elite private law firm to represent him in impeachment processes. *See* App. A 001–006, 020–021, 023–024, 026, 028, 034–042, 045, 081, 083, 086, 089–090, 092, 103, 106, 109–110, 120, 123, 125, 130. The other controversial issue is whether the DHS and Secretary Mayorkas were legally justified in retaining private counsel or whether they had had an appropriate factual predicate to do so. *See* App. A 001–003, 007–014, 017–018, 019–021, 023–024, 027–028, 037, 041–042, 045, 050, 055, 081, 083–084, 086, 089–090, 093, 096–098, 112, 118, 123, 125–126, 130.

The following factual Appendices are attached and expressly incorporated herein and made part of this request (as are the factual sources cited therein).¹⁴

¹³ DOJ has granted expedition under the DOJ Regulation in a number of circumstances. *See, e.g.*, *CREW v. DOJ*, 870 F.Supp.2d at 81 n. 14 (expedition granted to request seeking records on FBI’s closed investigation of Congressman DeLay for misconduct which did not result in charges, but received considerable media attention (subsequent history omitted)); *CREW v. DOJ*, 820 F.Supp.2d 39, 42, 46 (D.D.C. 2011) (expedition granted to request seeking information concerning possible deletion of Office of Legal Counsel emails where the possible deletion was flagged as a hindrance in an internal investigation, covered in the media, and was the subject of Congressional concerns); *Elec. Frontier Found. v. DOJ*, 565 F.Supp.2d 188, 189–91 (D.D.C. 2008) (expedition granted to request seeking information regarding storage of information obtained by National Security Letters in FBI’s Data Warehouse); *CREW v. DOJ*, No. 05-cv-2078 (EGS), 2006 WL 1518964, *1 (D.D.C. June 1, 2006) (expedition granted to request concerning government’s decision to seek a reduced penalty in tobacco litigation where government’s decision was subject to intensive news coverage and prompted concern from “several Congressman” which caused a request for an Inspector General investigation of “improper political interference” with the decision).

¹⁴ http://thf_media.s3.amazonaws.com/2023/Oversite_Project/DHS_impeachment_debevoise_Appendix_A-D.pdf

- Appendix A is a collection of pertinent transcripts of network news television broadcasts, national newspaper articles, press releases, and Twitter posts related to whether the Department of Homeland Security should have retained an elite large private law firm to represent Secretary Mayorkas and if there was legal and factual justification for the contract.¹⁵
- Appendix B is H. Res. 8, 118th Cong. and H. Res. 89, 118th Cong.¹⁶
- Appendix C is H. Res. 582, 117th Cong.¹⁷
- Appendix D is a Congressional letter from the Committee on Oversight and Accountability to Secretary Mayorkas questioning the sole-source no-bid contract awarded to Debevoise & Plimpton LLP.¹⁸

Without a doubt there is sustained national media cover of, and interest in,¹⁹²⁰ accusations by the House Committee on Oversight and Accountability,²¹ national news organizations,²²²³ other public figures, and subject matter experts that DHS acted improperly in this instance. The DHS contract with private counsel is a very controversial issue raising three major questions, among others. At a policy level, there is substantial interest in whether spending \$1.5 million of taxpayer dollars on retaining an elite law firm is an appropriate use of the public fisc. There is also sustained interest in whether DHS can legally hire counsel to represent Secretary

¹⁵ http://thf_media.s3.amazonaws.com/2023/Oversite_Project/DHS_impeachment_debevoise_Appendix_A-D.pdf

¹⁶ http://thf_media.s3.amazonaws.com/2023/Oversite_Project/DHS_impeachment_debevoise_Appendix_A-D.pdf

¹⁷ http://thf_media.s3.amazonaws.com/2023/Oversite_Project/DHS_impeachment_debevoise_Appendix_A-D.pdf

¹⁸ http://thf_media.s3.amazonaws.com/2023/Oversite_Project/DHS_impeachment_debevoise_Appendix_A-D.pdf

¹⁹ Fox News. (Accessed: 2023, Feb. 22). DHS tapped left-leaning firm for potential Mayorkas impeachment efforts over southern border crisis. <https://www.foxnews.com/politics/dhs-tapped-left-leaning-firm-potential-mayorkas-impeachment-efforts-over-southern-border-crisis>.

²⁰ Fox News. (Accessed: 2023, Feb. 22). Oversight Committee probes 'no-bid' DHS contract to law firm to handle Mayorkas impeachment efforts. <https://www.foxnews.com/politics/oversight-committee-probes-no-bid-dhs-contract-law-firm-handle-mayorkas-impeachment-efforts>.

²¹ Committee on Oversight and Accountability. (Accessed: 2023, Feb. 22). Letter to DHS on Sole-Source No-Bid Contract. <https://oversight.house.gov/wp-content/uploads/2023/02/Letter-to-DHS-on-Sole-Source-No-Bid-Contract.pdf>.

²² The Hill. (Accessed: 2023, Feb. 22). DHS hires outside law firm for help with potential Mayorkas impeachment. <https://thehill.com/policy/national-security/3852862-dhs-hires-outside-law-firm-for-help-with-potential-mayorkas-impeachment/>.

²³ Politico. (Accessed: 2023, Feb. 22). Biden Cabinet member lawyers up as GOP threatens impeachment. <https://www.politico.com/news/2023/02/10/republicans-lawyers-alejandro-mayorkas-00082301>.

Mayorkas against impeachment allegations. Finally, there is interest in whether the DHS had an adequate factual basis for the contract.

The foregoing undoubtedly undermines the serious questions that have been raised, which undermines the public's confidence in DHS operations. Indeed, the House Committee with the principal duty to oversee the Executive has said the public should question DHS's integrity in operations. *See* App. D 001–02. Expedition is warranted.

Thank you in advance for considering my request. If you have any questions, or feel you need clarification of this request please contact me at

Sincerely,

Kim Lain
Investigative Columnist
The Daily Signal