

EXHIBIT 2



FREEDOM WATCH

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Via Mail and Fax

February 24, 2016

Information and Privacy Coordinator
ATTN: Freedom of Information Act (FOIA) Contact
U.S. Department of State, SA-2
515 Twenty-Second Street, N.W.
Washington, DC 20522-6001
Facsimile: (202) 261-8579

Re: Freedom of Information Act Request

Dear Sir/Madam:

Freedom Watch, Inc. hereby submits this request for information in terms of the documents described herein pursuant to the Freedom of Information Act ("FOIA") (5 U.S.C. § 552) and U.S. Department of State regulations 22 C.F.R. §§171.1, 171.5.

The definitions for relevant, key terms are established by Department of State regulations 22 C.F.R. §§ 171.11 through 171.13. In this request, a "document" also includes a "record" as defined in the regulations.

22 C.F.R. §171.1 provides that "Records of the Department of State shall be made available to the public upon request made in compliance with the access procedures established in this part, except for any records exempt by law from disclosure. Any request for records must describe the information sought in such a way (see §171.5(c)) that an employee of the Department of State who is familiar with the subject area of the request can locate the records with a reasonable amount of effort."

Accordingly, the Department of State's response cannot be performed by a keyword computer search. 22 C.F.R. §171.1 requires "that an employee of the Department of State who is familiar with the subject area of the request ... locate the records with a reasonable amount of effort." The Department's response must include a search by one or more employees "familiar with the subject area of the request" with regard to each request and topic area. 22 C.F.R. §171.1 requires a search on each topic and request by a knowledgeable human being who is a subject-matter expert and prohibits a search of keywords by an information specialist unfamiliar with "the subject area of the request."

Freedom Watch, Inc. hereby requests that that the Department of State produce all documents including correspondence, memoranda, documents, reports, records, statements, audits, lists of names, applications, diskettes, letters, expense logs and receipts, calendar or diary logs, facsimile

logs, telephone records call sheets, tape recordings, video/movie recordings, notes, examinations, opinions, folders, files, books, manuals, pamphlets, forms, drawings, charts, photographs, electronic mail, and other documents and things that refer or relate to the following in any way, within ten (10) business days of receipt of this request as set forth below:

- 1) Any and all SF-50 (Notification of Personnel Action) forms for Ms. Huma Abedin. Specifically, each and every Standard Form 50, being a standardized form promulgated by the U.S. Office of Personnel Management, created with line 1 filled out as "Abedin, Huma" for Last and first name. An example is attached hereto.
- 2) Any and all contracts (including, but not limited to, personal service contracts) between the U.S. Department of State and Ms. Human Abedin.
- 3) Any and all records regarding, concerning, or related to any or all authorization(s) for Ms. Human Abedin to represent individual clients and/or otherwise engage in outside employment while employed by and/or engaged in any contractual arrangement with the Department of State.

Freedom Watch notes that President Barack Obama has ordered the Executive Branch in his January 21, 2009, Memorandum concerning the Freedom of Information Act, at 74 Fed. Reg. 4683, that:

“All agencies should adopt a presumption in favor of disclosure, in order to renew their commitment to the principles embodied in FOIA.... The presumption of disclosure should be applied to all decisions involving FOIA.” And furthermore “The Freedom of Information Act should be administered with a clear presumption: In the case of doubt, openness prevails.”

If any responsive record or portion thereof is claimed to be exempt from production under FOIA, sufficient identifying information (with respect to each allegedly exempt record or portion thereof) must be provided to allow the assessment of the propriety of the claimed exemption. *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert denied*, 415 U.S. 977 (1974). Additionally, pursuant to law, any reasonably segregable portion of a responsive record must be provided after redaction of any allegedly exempt material. 5 U.S.C. §552(b).

Freedom Watch requests a waiver of all fees for this request under 5. U.S.C. § 552(a)(4)(A)(iii) and 22 C.F.R. §171.15(b) or (c). Freedom Watch has consistently been determined for FOIA purposes to be operating in the interest disseminating this type of information about government activities to journalists and the public. Freedom Watch is engaged in the active dissemination of public information as is evident by our ongoing public interest legal work. Larry Klayman, who is Freedom Watch’s General Counsel, writes a weekly column. Larry Klayman frequently appears on radio and television to disseminate the information to the public. Freedom Watch releases information to the public through regular press releases and its website. Disclosure of

the requested information to Freedom Watch is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not in any commercial interest. Freedom Watch's website, www.freedomwatchusa.org serves to disseminate information, and is seen by millions of people annually.

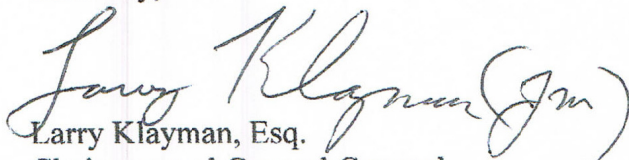
Pursuant to 5 U.S.C. § 552(a)(6)(E)(i), Freedom Watch requests compliance with this FOIA request on an expedited basis within ten (10) calendar days, as these documents have already been searched for and produced to Judicial Watch, notwithstanding withheld documents and issues concerning the private email server of former Secretary Hillary Clinton.

The U.S. Court of Appeals for the District of Columbia Circuit in *Open America v. Watergate Special Prosecution Force*, 547 F.2d 605, 614-16 (D.C. Cir. 1976)(citing 5 U.S.C. § 552(a)(6)(C)) recognized that some FOIA requests necessarily involve a far greater degree of urgency than others and that when a requester can show "exceptional need or urgency," his request should be processed out of turn. 547 F.2d at 616. No precise criteria have been mandated. However, in *Schacter v. IRS*, 3 GDS ¶ 82,515 at 83,302-03 (D.D.C. 1982), the U.S. District Court for the District of Columbia ordered immediate disclosure of a record because of the immediacy of the need resulting from imminent action by Congress.

The information is urgently needed by a public interest group such as Freedom Watch primarily engaged in publicizing information in order to inform the public concerning actual or alleged government activity. The information relates to a breaking news story of general public interest and not purely of historical interest only. The information concerns some actions taken, contemplated, or alleged by or about the government of the United States, or one of its components or agencies, including the Congress.

You may have the documents delivered to the address below.

Sincerely,



Larry Klayman, Esq.
Chairman and General Counsel
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