



**FREEDOM WATCH**

► [www.FreedomWatchUSA.org](http://www.FreedomWatchUSA.org)

► **World Headquarters** 2020 Pennsylvania Avenue, N.W., Suite 345, Washington, DC 20006-1811 ► (310) 595-0800 ► [leklayman@gmail.com](mailto:leklayman@gmail.com)

March 26, 2018

VIA FACSIMILE, FEDEX AND MAIL

Ms. Laurie Day  
Chief, Initial Request Staff  
Office of Information Policy  
U.S. Department of Justice  
1425 New York Avenue, N.W., Suite 11050  
Washington, DC 20530-0001  
Fax: (202) 514-1009

FOIA/PA Mail Referral Unit  
U.S. Department of Justice  
LOC Building, Room 115  
Washington, DC 20530-0001  
Fax: (202) 616-6695

Ms. Amanda Marchand Jones  
Chief, FOIA/PA Unit  
Criminal Division  
U.S. Department of Justice  
Keeney Building, Suite 1127  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001  
Fax: (202) 514-6617

Federal Bureau of Investigation  
Attn: FOI/PA Request  
Record/Information Dissemination Section  
170 Marcel Drive  
Winchester, VA, 22602  
Fax: (540) 868-4391

Re: Freedom of Information Act Request

Dear Ladies and Gentlemen:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and regulations promulgated thereunder, we hereby request from the Office of Office of the Attorney

General and the U.S. Department of Justice (DOJ), and DOJ's Federal Bureau of Investigation, any and all documents that refer or relate in any way to the specific requests set forth below.

Freedom Watch requests expedited processing of this request pursuant to 28 C.F.R. § 16.5 (e) of the regulations governing the the requestees' operations because time is of the essence in the events at issue for public knowledge of the nation's citizens

Freedom Watch requests that you provide the requested documents within ten (10) calendar days of receipt of this request.

### **FREEDOM OF INFORMATION REQUESTS**

For the purpose of this Freedom of Information Act Request (FOIA Request), you must consider and comply with this request in good faith and in a timely matter. Please note that a document that has been altered with the addition of handwritten notes or other information added is not the same document as the unaltered original.

#### Definitions

For the purpose of this FOIA request the term "document" is hereby defined expansively to include any or all of the following, whether existing as electronic, digital, or computer data, in electronic or digital form, or in paper form: correspondence, letters, memoranda, recommendations, records, orders, plans, proposals, meeting agendas, minutes of meetings, briefing materials, progress reports, weekly reports, talking points, briefing papers, requests for action, telephone logs, telephone message books, notes of phone messages or visits, routing slips, buck slips, standard government forms containing information filled in on lines or blank spaces, slide presentations, "card decks" (for presentations at meetings), power-point presentations, facsimiles (faxes), notes, handwritten notes, notes to the file, requests for decision, requests for authorization, tape recordings, video recordings, electronic mail (email) messages, summaries, briefs, orders, written decisions, applications, , and/or other documents and things. In addition, with regard to payments to persons or vendors, documents also include all invoices, bills, contracting records, commitment of funds, obligation of funds, or disbursement records.

For the purposes of this FOIA request, you are to search and produce any responsive documents or records that are within the U.S. Department of Justice and the Federal Bureau of Investigation's possession, custody, or control regardless of who authored or created the document or record.

For the purposes of this FOIA request, the term "communication" includes any form of communication, such as by letter, by facsimile, by note, by telephone text message, by electronic mail (email), computer messaging service, or by any other means.

#### Requests

*Request #1:* Any and all documents and records as defined and set forth above that refer or relate to Attorney General Jeff Sessions and his staff's review of the prosecution of Cliven Bundy in *United States v. Bundy et al.*, 2:16-cr-00046 (D. Nev).

*Request #2:* Any and all documents and records as defined and set forth above that refer or relate to former Federal Bureau of Investigation Deputy Director Andrew McCabe's investigation concerning Jeff Sessions' alleged perjury before Congress wherein Mr. Sessions denied meeting with Russian ambassadors.

*Request #3:* Any and all documents and records as defined and set forth above that refer or relate to the congressionally recommended appointment of a Special Counsel to investigate the Fusion GPS scandal and former Secretary of State Hillary Clinton's private email scandal and related matters.

### **LEGAL GUIDELINES**

In accordance with FOIA and its regulations, policies and precedents directing that the FOIA focuses on information, not only documents, we request maximum disclosure of information and documents, including any segregable portions of documents if some portions are withheld due to a claim of privilege or exemption.

If any documents are withheld subject to any claim of privilege or exemption, we request complete information about each document withheld, including which paragraph of the request to which the document is responsive; the author and title of the document; an explanation of the applicability of the claimed exemption to the contents of the document; and the name and title of each person responsible for the denial.

Furthermore, as to any claim that documents will be withheld on the basis of any deliberative process privilege we draw your attention to the legal requirements that the deliberative process exemption does not permit withholding of --

- (a) facts which are segregable from deliberations
- (b) opinions about such facts which merely convey or further describe factual information;
- (c) any deliberations unrelated to any actual decision;
- (d) any deliberations in areas where there are allegations of governmental misconduct, and
- (e) deliberations, opinions, or recommendations that are incorporated into a final decision and/or which serve to explain a final decision by the government.

We therefore demand production of all documents in unredacted form notwithstanding any possible claim of the deliberative process exemption or any other claimed exemption.

### **REQUEST FOR FEE WAIVER**

The requesters also respectfully request a blanket fee waiver on behalf of the public interest, to which it is entitled under 5 U.S.C. § 552(a)(4)(A); *see also*, *Larson v. Central Intelligence Agency*, 843 F.2d 1482, 1483 (D.C. Cir. 1988); *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989); *see also*, *Judicial Watch, Inc. v. United States Dep't. of Commerce*, No. 95-0133 (D.D.C. May 16, 1995) (order granting Judicial Watch USA, Inc.'s request for fee waiver with regard to all responsive documents in proceeding).

Requester Freedom Watch USA, Inc. is a non-profit, non-partisan, tax-exempt 501(c)(3) organization which as a public interest organization which specializes in deterring, monitoring, uncovering, and addressing public corruption in government. Freedom Watch USA has and will hold Republicans, Democrats, and Independents equally accountable to ethical and legal standards for honest and open government. It disseminates information, as is its mission, to the public through its website at [www.freedomwatchusa.org](http://www.freedomwatchusa.org), press releases, seminars and speeches, the radio show of its chairman and general counsel, Larry Klayman (*see* [www.radioamerica.org](http://www.radioamerica.org) or [www.freedomwatchusa.org](http://www.freedomwatchusa.org)), You Tube, Roku, Amazon Fire, Twitter, and appearances on other radio shows and cable news networks such as Fox News, One America Network, i 24, and Newsmax.com. Freedom Watch's chairman and general counsel, Larry Klayman, also has published a weekly column at [www.wnd.com](http://www.wnd.com) and has a blog named "Klayman's Court" at Newsmax.com, among other forms of public dissemination of information to educate the citizenry.

The requesters have no commercial purpose as a 501(c)(3) non-profit organization organized exclusively to improve the ethical and legal standards in government, accountability of government officials to the rule of law, and public understanding of government operations.

Freedom Watch thus will also use the requested material to promote accountable government as a representative of the news media and the public in accordance with 5 U.S.C. § 552(a)(4)(A)(ii)(II) and *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989), by disseminating relevant information which may be uncovered. Information will benefit the public by identifying areas for future reform as well as deterring future abuses that could otherwise proliferate without scrutiny.

The subject of this request is information concerning the operations and activities of the government. Past experience of demonstrates the success of Freedom Watch in uncovering important facts about government activities, integrity and operations, of broad concern to the public. This request is likely to "contribute significantly" to the public's understanding of the operations of their government, satisfying the requirements of FOIA fee waiver provisions.

Immediate release of the requested information is in the public interest, including for promoting confidence in an honest democratic system, and furthering the integrity of the American national government by deterring and/or sanctioning corrupt activities. The

failure to do so will likely result in the further compromise of important interests of the American people.

**REQUEST FOR EXPEDITED PROCESSING**

Freedom Watch hereby requests expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I), as there is a compelling need for this information and time is truly of the essence in this matter. *See Open America v. Watergate Special Prosecution Force*, 547 F.2d 605, 614-16 (D.C. Cir. 1976) (holding that requests that involved a far greater degree of urgency than others should be processed out of turn).

Pursuant to U.S.C. §552(a)(6)(E), the foregoing is true and correct to the best of Freedom Watch's knowledge and belief.

Sincerely,



Larry Klayman, Esq.  
Freedom Watch, Inc.  
2020 Pennsylvania Ave, N.W., Suite 345  
Washington, D.C. 20006  
Tel: 310 595 0800  
leklayman@gmail.com

Chairman and General Counsel

PLEASE SEND TRUE COPIES OF THE REQUESTED DOCUMENTS WITH 10 CALENDAR DAYS BY EXPRESS MAIL, AS DEFINED HEREIN, TO THE ABOVE ADDRESS.

## FAX COVER SHEET

TO	FBIFOI/PARquest
COMPANY	
FAXNUMBER	15408684997
FROM	Larry Klayman
DATE	2018-03-26 17:48:50 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a Freedom of Information Request from Freedom Watch, Inc.

## FAX COVER SHEET

TO	AmandaJones
COMPANY	DOJ Criminal Division FOIA
FAXNUMBER	12025146117
FROM	Larry Klayman
DATE	2018-03-26 17:48:48 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a Freedom of Information Request from Freedom Watch, Inc.

## FAX COVER SHEET

TO	Laurie Day
COMPANY	Office of Information Policy
FAXNUMBER	12025141009
FROM	Larry Klayman
DATE	2018-03-26 17:48:46 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a Freedom of Information Request from Freedom Watch, Inc.



## FAX COVER SHEET

TO	FOIA/PA Mail Referral Unit
COMPANY	
FAXNUMBER	12026166695
FROM	Larry Klayman
DATE	2018-03-26 17:48:47 GMT
RE	Freedom of Information Act Request

### COVER MESSAGE

Attached is a Freedom of Information Request from Freedom Watch, Inc.