

REDACTED

EXHIBIT B
TO
PLAINTIFFS' COMPLAINT

REDACTED

From: Perienne Sadler [REDACTED]
Sent: April 3, 2018 9:22 AM
To: FOIPAQUESTIONS
Subject: Re: FOIA Request #1355904

When will my 500 page interim release arrive? I was told this would be a ten month process which meant it would be ready before July of 2018. How has this been pushed off until November of 2019?

If this stands in the way of justice, what options do I have to expedite this right away?

Keep in mind it was opened two years ago, and the FBI made a mistake in the mailing address.

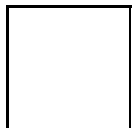
Perienne

From: FOIPAQUESTIONS <FOIPAQUESTIONS@FBI.GOV>
Sent: March 27, 2018 6:59 AM
To: [REDACTED]
Subject: FW: FOIA Request #1355904

Thank you for your inquiry regarding the status of your Freedom of Information Act/Privacy (FOIPA) request. A review of your request has determined the following:

The request is presently awaiting assignment to a Disclosure analyst who will then review the records to determine if any redactions are required pursuant to subsections of Title 5, U. S. Code, Section 552 and 552a.

You may check the status of your request online at <http://vault.fbi.gov> by clicking on the **'Check Status of Your FOI/PA Request'** link. Online status reports are updated weekly.



The Vault

vault.fbi.gov

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Requests are processed in the order in which they are received through our multi-track processing system. Requests are divided into two primary tracks--simple (under 50 pages of potentially responsive documents) and complex (over 50 pages of potentially responsive documents). Complex requests are further divided into medium, large, and extra-large sub-tracks based upon request size. Simple track requests typically require the least amount of time to process. Currently, simple track cases average approximately 80 days from the date of receipt for processing. Our complex requests in the large processing track are currently averaging approximately 774 days for processing.

Your request is currently in the complex request large processing track, and the estimated date of completion for your request is November 2019. Reducing the scope of your request can accelerate the process as it could potentially place your request in a quicker processing track. This may also reduce any search and duplication costs, if applicable, and allow for a more timely receipt of your information. If you wish to discuss reducing the scope of your request, please notify us in writing.

Respectfully,

Public Information Officer

Record/Information Dissemination Section (RIDS) FBI-Records Management Division
170 Marcel Drive, Winchester, VA 22602-4843

Direct: (540) 868-4593



Fax: (540) 868-4391/4997

Questions E-mail: foipaquestions@fbi.gov

Do you have further questions about the FOI/PA process? Visit us at <http://www.fbi.gov/foia>

Please check the status of your request online at <https://vault.fbi.gov/fdps-1/@@search-fdps> Status updates are performed on a weekly basis.

Note: This is a non-emergency email address. If this is an emergency, please call 911 directly. If you need to report a tip for immediate action, please contact FBI Tips at <http://tips.fbi.gov/> or reach out to your local field office.

From: Perienne Sadler [<mailto:> 
Sent: Monday, March 26, 2018 8:16 PM
To: Wilson, Leslie C. (RMD) (FBI) 
Subject: Re: FOIA Request #1355904

Hi Ms. Wilson,

I am wondering if you know when this will be handled - it has been sitting for the amount of time you suggested it would take.

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Could you be so kind as to provide an update?

Thank you!

Perienne

From: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Sent: October 23, 2017 6:50 AM
To: Perienne Sadler
Subject: RE: FOIA Request #1355904

Good morning Ms. Sadler,

Please check the status of your FOIPA Request at <http://vault.fbi.gov> by clicking on "Check Status of Your FOI/PA Request" on the right side of the page, and follow the instructions below. You may submit your consideration for an expedite processing to the FOIPA Question email: foipaquestions@ic.fbi.gov<<mailto:foipaquestions@ic.fbi.gov>>. Please cite your FOIA Request number with your submission.

Check the Status of Your FOIPA Request:

If your FOIPA Number is [1195846-0] please enter [1195846-000] into the system. If your FOIPA Number is [1195846-1] please enter [1195846-001] into the system. If you have any questions about the status of your FOIPA request, please e-mail foipaquestions@ic.fbi.gov<<mailto:foipaquestions@ic.fbi.gov>>.

FIND STATUS OF FOIPA- Request statuses are updated weekly

Please enter the whole FOIPA number-Example: [1234567-000]

FOIPA:

Results will show the Request Number, Case Type and Process Description shown below:

FOIPA:

1234567-000

Case Type:

FOIPA

Process Description (Will display the current progress of the request)

The FBI's FOIPA Program is searching the FBI's indices for potentially responsive documents.

NOTE: Recent requests are entered into the FOIPA database in the order that they are received. Before you can check the status, you must have received correspondence assigning a FOIPA request number and the information transferred to the online database. Status information is updated weekly. If a request has been closed within the last six months the online database will display the following: The FOIPA number entered has been closed, and appropriate correspondence has been sent to the address on file.

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Best regards,
Ms. Wilson

From: Perienne Sadler [mailto: [REDACTED]]
Sent: Sunday, October 22, 2017 12:15 PM
To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Subject: Re: FOIA Request #1355904

Hi Ms. Wilson,

I wanted to touch base and see if there was any kind of timing update?

This request does meet the expediting requirements - is that a route we should take? How do i file that request?

Perienne de Jaray

From: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Sent: September 19, 2017 9:44 PM
To: Perienne Sadler
Subject: RE: FOIA Request #1355904

There are certain requirements for an expedite handling of a FOIA request. The FBI.gov website under the FOIA pages does have a link to the Code of Federal Regulations for FOIA. It will provide the specifics of expedited processing there.

Thank you for confirming the address. I do apologize for misunderstanding on the size of your request. I thought there was an email that stipulated just the main file sections at one point. I did find the email which stated willingness to pay for all.

Sincerely,
Ms. Wilson

From: Perienne Sadler [mailto: [REDACTED]]
Sent: Tuesday, September 19, 2017 5:23 PM
To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Subject: Re: FOIA Request #1355904

The address is correct!

Hopefully I'll see her interim release soon!

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Is there any ability to expedite it? Is there a fee or a process if litigation is involved for this to proceed with any more speed than 10 months?

Thanks!

Perienne

Sent from my iPhone

On Sep 19, 2017, at 2:21 PM, Wilson, Leslie C. (RMD) (FBI) [REDACTED] wrote:

My mistake then I thought you had agreed to the reduction. I will change the notes and the case will proceed in full to be processed as a large track request. Please confirm the address so I do know I'm sending it to the most current address.

Sincerely,
Ms. Wilson

From: Perienne Sadler [mailto:[REDACTED]]
Sent: Tuesday, September 19, 2017 5:01 PM
To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Subject: Re: FOIA Request #1355904

Ms Wilson,

I did not want to reduce the size - we need the entire file - all 1600 documents! I said absolutely not, we cannot reduce the size, we need all 1600 documents....

Please confirm

Sent from my iPhone

On Sep 19, 2017, at 1:57 PM, Wilson, Leslie C. (RMD) (FBI) [REDACTED] wrote:

Good afternoon,

Your request has been reopened. I will be mailing out to you a letter confirming the decision discussed August 14th to reduce to the processing of the 3 main file sections. The page count is estimated at approximately 783 pages, potentially responsive.

I'm using the following address as the latest one you had provided me earlier this summer. [REDACTED]
[REDACTED] BC Canada [REDACTED] Please let me know immediately if this is incorrect.

Since your request is now considered a medium sized case, it will move forward to be directly assigned to analyst. Currently, the estimated average time for completion of all materials is about 10

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months. There will be an interim release on CD of about 500 processed pages. FOIA and Privacy Act exemptions may be applicable thus some material will be redacted accordingly.

You can visit the FBI.gov site under FOIA there is a spot to check on the status of your request. It is updated weekly but it maybe a couple of months before that first release is made.

Thank you for your patience.

Sincerely,
Ms. Wilson

From: Perienne Sadler [<mailto:> [REDACTED]]
Sent: Monday, September 18, 2017 9:12 PM
To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Subject: Re: FOIA Request #1355904

Hi Leslie,

Attached is Steve's Form for you.

Please let me know timing and anything else you need to proceed?

Thanks!

Perienne

From: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Sent: September 18, 2017 1:38 PM
To: Perienne Sadler
Subject: RE: FOIA Request #1355904

Good morning Ms. Sadler,

You can provide the form as an attachment in an email to me or you may fax it via [REDACTED]. Please note your FOIA number on any correspondence.

Sincerely,
Ms. Wilson

-----Original Message-----

From: Perienne Sadler [<mailto:> [REDACTED]]
Sent: Friday, September 15, 2017 10:27 AM
To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]
Subject: Re: FOIA Request #1355904

Hi Leslie,

REDACTED

I received the new estimate of cost for the files in the mail. I, of course, am happy to cover that cost.

I will send you the below form from Steve today!

Many thanks

Perienne

Sent from my iPhone

> On Aug 17, 2017, at 7:33 AM, Wilson, Leslie C. (RMD) (FBI) [REDACTED] wrote:

>

> Good morning,

>

> I've attached the form to this email and the link is provided in case it doesn't come through for you.

>

> <https://www.fbi.gov/file-repository/u-s-department-of-justice-form-361-certification-of-identity.pdf/view>

>

> Leslie Wilson

>

> -----Original Message-----

> From: Perienne Sadler [mailto:[REDACTED]]

> Sent: Thursday, August 17, 2017 10:17 AM

> To: Wilson, Leslie C. (RMD) (FBI) [REDACTED]

> Subject: Re: FOIA Request #1355904

>

> Hi Leslie

>

> Could you kindly send me the privacy form required for Steve to proceed with the request as we discussed? I will have that signed and sent to you right away!

>

> Perienne

>

> Sent from my iPhone

>

>> On Aug 11, 2017, at 3:01 PM, Perienne Sadler [REDACTED] wrote:

>>

>> Leslie,

>>

>> I need some clarification on this. I don't understand why it all cannot be processed? We have been waiting for a very long time already.

>>

>> I absolutely agree to any costs - 55.00 is just fine.

>>

>> I do need the file as there is a litigation requiring it with some urgency.

>>

>> Could you advise?

>>

>> Thank you ,

>> Perienne

>>

>> Sent from my iPhone

REDACTED

>>

>>> On Aug 9, 2017, at 4:42 AM, Wilson, Leslie C. (RMD) (FBI) [REDACTED] wrote:

>>>

>>> Good morning Ms. DeJaray,

>>>

>>> I'm following up with the phone call we had yesterday afternoon regarding your FOIA request. The cost letter dated June 20, 2017 indicated 1,518 records had been located which may potentially be responsive to your request. We need written confirmation that you have agreed to any costs associated with the processing of your case. The costs were stated for this number of records to be at \$55.00.

>>>

>>> Because your request is considered a large sized case, it was sent to negotiations for us to see if you would consider reducing the size of your request. I've just looked at the records and I believe if only main sections of the file are processed, the more exact number of pages to be reviewed is just under 800 pages. This size would move your request into the medium track queue for processing. The current estimated time for processing a medium sized case is approximately 10 months. There will be an interim release of 500 pages which then is followed by the final release. The other significant difference between the medium and large track queues, is that a large case moves into an unassigned backlog until it can be picked up and worked into an analyst's queue. The processing time for large sized cases is greatly increased over the medium track. In addition, medium sized cases are placed into a direct assign backlog.

>>>

>>> So please confirm that you are willing to pay costs associated with the request as noted in the cost letter; and, if you are interested in narrowing the size of your request.

>>>

>>> Thank you for your time and consideration of this inquiry.

>>> Leslie Wilson

> <DOJ 361 form.pdf>