

EXHIBIT B

Case No. 19-3232



Genevieve Nadeau <genevieve.nadeau@protectdemocracy.org>

eFOIA Request Received

1 message

efoia@subscriptions.fbi.gov <efoia@subscriptions.fbi.gov>
To: genevieve.nadeau@protectdemocracy.org

Fri, Aug 16, 2019 at 3:25 PM

Organization Representative Information

Organization Name The Protect Democracy Project

Prefix

First Name Genevieve

Middle Name

Last Name Nadeau

Suffix

Email genevieve.nadeau@protectdemocracy.org

Phone 202 579 4582

Location United States

Domestic Address

Address Line 1 2020 Pennsylvania Avenue, NW, #163

Address Line 2

City

State

Postal

Agreement to Pay

How you will pay

I am requesting a fee waiver for my request and have reviewed the FOIA reference. If my fee is not waived, I will pay up to the maximum amount in the box below.

Allow up to \$

Proof Of Affiliation for Fee Waiver

Waiver Explanation

Documentation Files

Non-Individual FOIA Request

Request Information

Please see attached letter.

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, The Protect Democracy Project ("Protect Democracy") requests that your agency produce within 20 business days the following records concerning threats of violence and other unlawful activity by white supremacist and other hate groups at President Trump's political campaign events. We

ask that you search for records from all components of the U.S. Secret Service and the Federal Bureau of Investigation that may be reasonably likely to produce responsive results. The time period for all requests is January 2016 to present.

1. Documents concerning explicit or implicit threats of violence made or posed by any white supremacist group or hate group in connection with any event hosted by Donald J. Trump for President (including the president's initial and reelection campaigns, hereinafter collectively referred to as the "Trump Campaign").
2. Documents indicating that your agency (or any other agency of the federal government) has identified white supremacist groups or hate groups, generally or specifically, as posing a threat of violence or other unlawful activity at events hosted by the Trump Campaign.
3. Documents indicating that your agency (or any other agency of the federal government) has identified individuals who hold white supremacist or white nationalist views as posing a threat of violence or other unlawful activity at events hosted by the Trump Campaign.
4. Communications or other documents exchanged with state or local law enforcement agencies concerning explicit or implicit threats of violence made or posed by any white supremacist group or hate group in connection with any event hosted by the Trump Campaign.
5. Documents concerning the arrest and/or prosecution of any member of any white supremacist group or hate group in connection with violence, harassment, threats, or intimidation at any event hosted by the Trump Campaign.
6. Documents indicating that any member of any white supremacist group or hate group has been barred or otherwise prevented from attending any event hosted by the Trump Campaign.
7. Documents indicating or reflecting any advice or instructions given to Trump Campaign personnel concerning the incitement or encouragement of violence at Trump Campaign events.

Expedite

Expedite Reason

Please see attached letter.

EXPEDITED PROCESSING REQUEST

We request that you expedite the processing of this request pursuant to 5 U.S.C. Â§ 552(a)(6)(E), 6 C.F.R. Â§ 5.5(e) [DHS], and 28 C.F.R. Â§ 16.5(e) [DOJ]. This request meets the criteria for expedited processing because there is an urgency to inform the public about an actual or alleged federal government activity and the request is made by a person who is primarily engaged in disseminating information. 6 C.F.R. Â§ 5.5(e)(1)(ii); 28 C.F.R. Â§ 16.5(e)(1)(ii).

Protect Democracy intends to disseminate the information obtained in response to this request. As the District Court for the District of Columbia has determined in litigation regarding a separate FOIA request, Protect Democracy satisfied these standards of being primarily engaged in disseminating information. Protect Democracy Project, Inc. v. U.S. Dep't of Def., 263 F. Supp. 3d 293, 298 (D.D.C. 2017). Indeed, Protect Democracy has routinely demonstrated the ability to disseminate information about its FOIA requests to a wide audience. Protect Democracy will disseminate information and analysis about this request and any information obtained in response through our website (protectdemocracy.org); our Twitter feed (@protctdemocracy), which has more than 14,000 followers; our email list of approximately 25,000 people; and by sharing information with other members of the press.

Moreover, these records are urgently needed to inform the public about actual or alleged government activity. See 5 U.S.C. Â§ 552(a)(6)(E)(v)(II). Specifically, the requested records relate to threats of violence and other unlawful activity by white supremacist and other hate groups at President Trump's political campaign events, and the government's knowledge and understanding of, and response to, such threats. Just this summer, FBI leadership acknowledged the ongoing threat posed by these groups and the individuals who share their ideologies. And there are numerous

reports of
actual or threatened activity by these groups at Trump
Campaign events
throughout the country.

It is therefore incumbent upon the government and urgent for
your agencies
to share any responsive records in an expedited fashion so
that Americans
can assess how the government is responding to threats of
racially motivated
violence during the active and ongoing 2020 presidential
campaign. These
disclosures are necessary to inform the public about its
safety in an arena
of political speech vital to our democracy.

**

Please be advised that efoia@subscriptions.fbi.gov is a no-reply email address. Questions regarding your FOIA request may be directed to foipaquestions@fbi.gov. If you have received a FOIPA request number, please include this in all correspondence concerning your request. Please note eFOIPA requests are processed in the order that they are received. If you have not received a FOIPA request number, your request is in the process of being opened at which time it will be assigned a FOIPA request number and correspondence will be forthcoming.

**

Upon receipt of your FOIPA request number, you may check the status of your FOIPA request on the FBI's electronic FOIA Library (The Vault) on the FBI's public website, <http://vault.fbi.gov> by clicking on the "Check Status of Your FOI/PA Request" link. Status updates are performed on a weekly basis. If you receive a comment that your FOIPA request number was not located in the database, please check back at a later date.