

# **EXHIBIT F**

**Case No. 19-3232**

**The Protect -  
Democracy  
Project**

September 20, 2019

By Email

Freedom of Information Act & Privacy Act Program  
United States Secret Service  
245 Murray Lane, SW, Building T-5  
Washington, DC 20223  
Phone: (202) 406-6370  
Fax: (202) 406-5586  
Email: [FOIA@USSS.DHS.GOV](mailto:FOIA@USSS.DHS.GOV)

Re: File No. 20191045

To Whom It May Concern:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, on August 16, 2019, The Protect Democracy Project submitted a detailed request for seven categories of U.S. Secret Service records concerning threats of violence by white supremacist and other hate groups at President Trump's political campaign events. On September 3, 2019, your agency responded with a "broadscope" letter indicating that our requests are too broad to allow agency officials to perform a reasonable search for responsive records.<sup>1</sup>

Although FOIA requires a requesting party to provide a reasonable description of records sought, the statute does not require that a requesting party know in advance the date, title, author, recipient, or custodian of particular documents in order to be entitled to have the agency search for and produce responsive records. Rather, FOIA requires only that a request allow "a professional employee of the agency who [is] familiar with the subject area of the request to locate the record with a reasonable amount of effort." *Truitt v. Dep't of State*, 897 F.2d 540, 545 n. 36 (D.C. Cir. 1990) (quoting H.R. Rep. No. 93-876, 93d Cong., 2d Sess. at 6 (1974)). We maintain that our original requests are sufficiently descriptive given the subject-matter of the records and information we are seeking. That said, based on our conversations with your FOIA office, we have attempted to narrow our requests. Among other things, we are narrowing our requests to seek records from December 1, 2016 to present. With respect to event-specific records, we ask that you prioritize the production of records in reverse chronological order, beginning with the most recent events.

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<sup>1</sup> This letter follows conversations with two employees of the agency's FOIA office on September 13, 2019.

1. Email communications, agency memoranda, or other documents (including campaign event itineraries, schedules, or agendas) identifying threats of violence made or posed by any known 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"). *[A list of past events by date and location is attached hereto. A partial list of relevant groups is included below.]*
2. Email communications, agency memoranda, or other documents indicating that any member of any known white supremacist group or hate group has been barred from attending any event hosted by the Trump Campaign. *[A list of past events by date and location is attached hereto. A partial list of relevant groups is included below.]*
3. Email communications, agency memoranda, or other documents indicating that any member of any known white supremacist group or hate group has been vetted by the agency for attendance at any event hosted by the Trump Campaign. *[A list of past events by date and location is attached hereto. A partial list of relevant groups is included below.]*
4. Email communications, agency memoranda, or other documents indicating or reflecting any advice or instructions given to Trump Campaign personnel concerning the incitement or encouragement of violence at Trump Campaign events.
5. Email communications, agency memoranda, or other 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 an ongoing or future threat of violence, unrest, or unlawful activity at events hosted by the Trump Campaign.
6. 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. *[A list of past events by date and location is attached hereto. A partial list of relevant groups is included below.]*
7. Email communications, agency memoranda, or other documents concerning the attendance of Enrique Tarrío, leader of a group called the Proud Boys, at President Trump's speech in Miami, Florida on February 18, 2019.

For purposes of these requests, "white supremacist group" means any social group or similar organization that self-identifies as "white supremacist" or "white nationalist" and/or whose primary purpose includes promoting the belief that white persons are inherently superior to persons of other races or that white persons should live and govern themselves separately from other races.<sup>2</sup> "Hate group" means any social group or similar organization whose primary purpose is to promote animosity, hostility, and malice against persons belonging to a race,

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<sup>2</sup> See, e.g., FBI News, *Domestic Threat: White Supremacy Extremism* (May 22, 2012), <https://www.fbi.gov/news/stories/domestic-threat>.

religion, disability, sexual orientation, or ethnicity/national origin which differs from that of the members of the organization.<sup>3</sup> ***Such groups include, but are not limited to, the Proud Boys, Fraternal Order of Alt-Knights, Rise Above Movement, Traditionalist Worker Party, Identity Evropa, Klu Klux Klan, Patriot Prayer, League of the South, National Socialist Movement, America Freedom Keepers, American Freedom Party, National Alliance, Patriot Front, The Right Stuff, White Boy Society, Aryan Nation, Atomwaffen Division, The Daily Stormer, Vanguard America, National Alliance, and American Guard.***

Please contact the undersigned at [genevieve.nadeau@protectdemocracy.org](mailto:genevieve.nadeau@protectdemocracy.org) or (202) 579-4582 if you require any additional information. Thank you in advance for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Genevieve Nadeau". The signature is written in a cursive, flowing style.

Genevieve Nadeau  
Counsel, The Protect Democracy Project

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<sup>3</sup> See FBI/CJIS, *Hate Crime Data Collection Guidelines and Training Manual, Version 2.0* (Feb. 27, 2015), <https://ucr.fbi.gov/hate-crime-data-collection-guidelines-and-training-manual.pdf/view>.

DATE	YEAR	CITY/TOWN	STATE	VENUE
Thursday, December 1, 2016	2016	Cincinnati	OH	U.S. Bank Arena
Tuesday, December 6, 2016	2016	Fayetteville	NC	Crown Coliseum
Thursday, December 8, 2016	2016	Des Moines	IA	Iowa Events Center
Friday, December 9, 2016	2016	Baton Rouge	LA	Dow Chemical Hangar, Baton Rouge Metropolitan Airport
	2016	Grand Rapids	MI	DeltaPlex Arena
Tuesday, December 13, 2016	2016	West Allis	WI	Wisconsin Exposition Center, Wisconsin State Fair Park
Thursday, December 15, 2016	2016	Hershey	PA	Giant Center
Friday, December 16, 2016	2016	Orlando	FL	Central Florida Fairgrounds
Saturday, December 17, 2016	2016	Mobile	AL	Ladd-Peebles Stadium
Saturday, February 18, 2017	2017	Melbourne	FL	Orlando Melbourne International Airport
Wednesday, March 15, 2017	2017	Nashville	TN	Nashville Municipal Auditorium
Monday, March 20, 2017	2017	Louisville	KY	Kentucky Exposition Center
Saturday, April 29, 2017	2017	Harrisburg	PA	Pennsylvania Farm Show Complex & Expo Center
Wednesday, June 21, 2017	2017	Cedar Rapids	IA	U.S. Cellular Center
Tuesday, July 25, 2017	2017	Youngstown	OH	Covelli Centre
Thursday, August 3, 2017	2017	Huntington	WV	Big Sandy Superstore Arena
Tuesday, August 22, 2017	2017	Phoenix	AZ	Phoenix Convention Center
Friday, September 22, 2017	2017	Huntsville	AL	Von Braun Center
Friday, December 8, 2017	2017	Pensacola	FL	Pensacola Bay Center
Saturday, March 10, 2018	2018	Moon Township	PA	Pittsburgh International Airport
Saturday, April 28, 2018	2018	Washington Tow	MI	Total Sports Park
Thursday, May 10, 2018	2018	Elkhart	IN	North Side Middle School
Tuesday, May 29, 2018	2018	Nashville	TN	Nashville Municipal Auditorium
Wednesday, June 20, 2018	2018	Duluth	MN	AMSOIL Arena
Saturday, June 23, 2018	2018	Las Vegas	NV	Nevada Republican Convention
Monday, June 25, 2018	2018	West Columbia	SC	Airport High School
Wednesday, June 27, 2018	2018	Fargo	ND	Scheels Arena
Thursday July 5, 2018	2018	Great Falls	MT	Four Seasons Arena
Tuesday, July 31, 2018	2018	Tampa	FL	Florida State Fairgrounds
Thursday, August 2, 2018	2018	Wilkes-Barre	PA	Mohegan Sun Arena at Casey Plaza
Saturday, August 4, 2018	2018	Lewis Center	OH	Olentangy Orange High School
Tuesday, August 21, 2018	2018	Charleston	WV	Charleston Civic Center

Thursday, August 30, 2018	2018	Evansville	IN	Ford Center
Thursday, September 6, 2018	2018	Billings	MT	MetraPark Arena
Thursday, September 20, 2018	2018	Las Vegas	NV	Las Vegas Convention Center
Friday, September 21, 2018	2018	Springfield	MO	JQH Arena
Saturday, September 29, 2018	2018	Wheeling	WV	WesBanco Arena
Monday, October 1, 2018	2018	Johnson City	TN	Freedom Hall
Tuesday, October 2, 2018	2018	Southaven	MS	Landers Center
Thursday, October 4, 2018	2018	Rochester	MN	Mayo Civic Center
Saturday, October 6, 2018	2018	Topeka	KS	Kansas Expocentre
Tuesday, October 9, 2018	2018	Council Bluffs	IA	Mid-America Center
Wednesday, October 10, 2018	2018	Erie	PA	Erie Insurance Arena
Friday, October 12, 2018	2018	Lebanon	OH	Warren County Fairgrounds
Saturday, October 13, 2018	2018	Richmond	KY	Alumni Coliseum
Thursday, October 18, 2018	2018	Missoula	MT	Minuteman Aviation
Friday, October 19, 2018	2018	Mesa	AZ	International Air Response
Saturday, October 20, 2018	2018	Elko	NV	Mountain West Aviation
Monday, October 22, 2018	2018	Houston	TX	Toyota Center
Wednesday, October 24, 2018	2018	Mosinee	WI	Central Wisconsin Airport
Friday, October 26, 2018	2018	Charlotte	NC	Bojangles' Coliseum
Saturday, October 27, 2018	2018	Murphysboro	IL	Southern Illinois Airport
Wednesday, October 31, 2018	2018	Fort Myers	FL	Hertz Arena
Thursday, November 1, 2018	2018	Columbia	MO	Columbia Regional Airport
Friday, November 2, 2018	2018	Huntington	WV	Tri-State Airport
	2018	Indianapolis	IN	Southport High School
Saturday, November 3, 2018	2018	Belgrade	MT	Bozeman Yellowstone International Airport
	2018	Pensacola	FL	Pensacola International Airport
Sunday, November 4, 2018	2018	Macon	GA	Middle Georgia Regional Airport
	2018	Chattanooga	TN	McKenzie Arena
Monday, November 5, 2018	2018	Cleveland	OH	I-X Center
	2018	Fort Wayne	IN	Allen County War Memorial Coliseum
	2018	Cape Girardeau	MO	Show Me Center
Monday, November 26, 2018	2018	Tupelo	MS	Tupelo Regional Airport
	2018	Biloxi		Mississippi Coast Coliseum
Monday, February 11, 2019	2019	El Paso	TX	El Paso County Coliseum

Thursday, March 28, 2019	2019	Grand Rapids	MI	Van Andel Arena
Saturday, April 27, 2019	2019	Green Bay	WI	Resch Center
Wednesday, May 8, 2019	2019	Panama City Beach	FL	Aaron Bessant Park Amphitheater
Monday, May 20, 2019	2019	Montoursville	PA	Williamsport Regional Airport
Tuesday, June 18, 2019	2019	Orlando	FL	Amway Center
Wednesday, July 17, 2019	2019	Greenville	NC	Williams Arena
Thursday, August 1, 2019	2019	Cincinnati	OH	U.S. Bank Arena
Thursday, August 15, 2019	2019	Manchester	NH	SNHU Arena
Monday, September 9, 2019	2019	Fayetteville	NC	Crown Expo Center
Monday, September 16, 2019	2019	Rio Rancho	NM	Santa Ana Star Center