

# **EXHIBIT H**

**Case No. 19-3232**



Genevieve Nadeau &lt;genevieve.nadeau@protectdemocracy.org&gt;

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**Re: 20191045-Search Done**

1 message

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**Genevieve Nadeau** <genevieve.nadeau@protectdemocracy.org>

Fri, Oct 4, 2019 at 5:42 PM

To: FOIA@usss.dhs.gov

Bcc: Genevieve Nadeau &lt;genevieve.nadeau@protectdemocracy.org&gt;

Thank you for your response and for your efforts at searching for records responsive to our FOIA request. Based on your most recent letter, however, it does not appear that the Secret Service is complying fully with its obligations under the statute. In particular, I'm writing to address inconsistencies between the nature and scope of your search and our requests.

As noted in our initial request dated August 16, 2019, Protect Democracy is seeking records concerning threats of violence by white supremacist and other hate groups at President Trump's political campaign events. Following receipt of a "broadscope" letter dated September 3, 2019, and subsequent conversations with your FOIA office, we narrowed our requests in a letter dated September 20, 2019.

In your most recent letter dated October 3, 2019, you indicate that you have conducted a search for records responsive to our requests. However, you include in that letter modified versions our requests -- versions that are more narrow than what we submitted to you. A call to your FOIA office today confirmed that your search was not consistent with our requests. Specifically, you interpreted Request Nos. 1-3, 5, and 6 to be limited to the events and groups we identified in our September 20 letter. However, our requests were not so limited. Rather, we included a list of events (by date and location) and a list of white supremacist/hate groups in order to aid in your search -- not to limit it. We specifically noted that the events included "past events" (as those are the only events we could reasonably identify) and that the list of groups was only "partial."

Most importantly, unlike other requests, Request No. 5 does not reference these specific past events or specific groups at all. In fact, by its terms, this request seeks records indicating that the Secret Service has identified white supremacist groups or hate groups as posing an "ongoing or future" threat -- *generally* (or specifically) -- in connection with Trump Campaign events. A search only for past events and a limited number of group names is not likely to yield the records we are seeking.

If we have misunderstood the nature or scope of your search, please let us know. To that end, it would help to have a written explanation of your search, including the specific search terms used for each of our requests. Please let me know if you are willing and able to provide such an explanation.

Sincerely,  
Genevieve Nadeau

Genevieve C. Nadeau  
Counsel, Protect Democracy  
(310) 770-7247

On Thu, Oct 3, 2019 at 8:18 AM <FOIA@usss.dhs.gov> wrote:

Dear Requester,

Please see the attached letter updating you on the status of your FOIA request.

If you have any questions, in regard to this matter, please contact this office at the number provided below.

Thank you,

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)

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